



Dickey Rural Telephone Cooperative
Dickey Rural Services, Inc.

Filed via ECFS

January 25, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554
Attn: Wireline Competition Bureau

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

Dickey Rural Telephone Cooperative (“Dickey Rural” or the “Company”), Study Area Code 381611, hereby notifies the Federal Communications Commission (“FCC” or “Commission”) and the Wireline Competition Bureau (“WCB” or “Bureau”) of changes that the Company made to its FCC Form 477 on December 4th 2015. The changes described herein contribute to a significant impact in the Alternative Connect America Model (“A-CAM”) for Dickey Rural’s neighboring Incumbent Local Exchange Carriers (“ILECs”), listed below. Dickey Rural respectfully requests that the Commission incorporate its modified Form 477 in the A-CAM and ensure that no impact is caused to the Company or its neighboring ILECs in North Dakota as a result of Dickey Rural’s previously-filed Form 477.

Dickey Rural’s previously-filed FCC Form 477 containing data as of December 31, 2014 had incorrectly identified numerous census blocks outside of its study area as having broadband service deployed by the Company’s 700 MHz wireless service. The mislabeled blocks were an inadvertent error that came to light when Dickey Rural and its neighboring ILECs began reviewing the A-CAM in depth.

Once Dickey Rural realized that its reported wireless broadband service area was impacting neighboring ILECs, the Company immediately took action and submitted revised data on December 4th 2015. However, Dickey Rural remains concerned that these changes will not be incorporated into the forthcoming versions of the A-CAM in a timely manner. Dickey Rural

respectfully requests that the FCC allow these corrections to be included in the A-CAM as soon as possible to reflect accurately these facts. Without these corrections, future versions of the A-CAM will not reflect the facts pertaining to the census blocks served by Dickey Rural and its neighboring North Dakota ILECs with the correct broadband technology and service area. Without these corrections, the Commission's universal service policy for the North Dakota ILECs study areas will be challenged as the amount of support available will not be sufficient to advance broadband technology in the area.

Sincerely,



Robert Johnson
General Manager/CEO
Dickey Rural Telephone Cooperative
PO Box 69
Ellendale, ND 58436

cc: Dakota Central Telecommunications Cooperative & Dakota Central Telecom I, Inc.
Polar Communications Mutual Aid Corporation
Inter-Community Telephone Company
Moore & Liberty Telephone Company