



April 20, 2016

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, D.C. 20554

RE: **Ex parte filing** in WC Docket No. 15-118

Dear Ms. Dortch:

Richard McBurney, CEO and General Manager of Butler-Bremer Mutual Telephone Company Inc. and the undersigned from GVNW Consulting, Inc. (GVNW) conducted an *ex parte* meeting with Lynne Engledow, Amy Goodman, Pamela Arluk and Deena Shetler of the Wireline Competition Bureau on April 19<sup>th</sup>.

We urged the Commission to expeditiously consider and grant the waiver requests filed by Butler-Bremer in its petition of May 12, 2015, and noted that there were no comments filed in opposition to the petition during the comment cycle conducted in June of 2015. We reiterated that granting of the waiver would reduce accounting, reporting and other administrative costs by \$45,000 per annum, consistent with the Commission's concern about operating expenses as demonstrated by its adoption of a limit on operating expenses in the recently adopted USF Reform Order.

In addition to the ability to lower costs sooner, we explained the additional urgency for a prompt Commission resolution of the waiver request created by the upcoming election by Butler-Bremer of either the model or legacy support regimes adopted in the USF Reform Order. Not only would grant of the petition simplify the election decision for Butler-Bremer, but it may also obviate the need for an additional petition for waiver if the current petition is not granted until after the model election is made.

As required by the Commission's rules, this ex parte record is now filed in the above referenced docket. If there are any questions, please call me on 301-738-0020.

Respectfully submitted,

Via ECFS 4/20/16

David B. Cohen, Esq.  
Senior Policy Advisor

Copy to  
Amy Goodman, FCC  
Lynne Engledow, FCC  
Pamela Arluk, FCC  
Deena Shetler, FCC  
Richard McBurney, Butler-Bremer