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EX PARTE PRESENTATION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Tri-County Telephone Association, Inc., Petition for Waiver of
Accounting Rules, WC Docket No. 08-239.

Dear Ms. Dortch:

On April 21, 2016, on behalf of Tri-County Telephone Association, Inc. ("TCT"), I spoke by telephone with Pamela Arluk, Chief of the Competitive Pricing Division of the Wireline Competition Bureau, concerning the above-captioned proceeding.

I stated that TCT has reviewed the recent Commission Report & Order in *Connect America Fund*, WC Docket No. 10-90, *et al.*, FCC 16-33 (rel. Mar. 30, 2016). Nothing in the Report & Order obviates the need for the requested waiver. Nothing in the new rules would impact the financial estimate TCT filed previously in this docket, other than the obvious industry-wide impacts associated with a decline in the allowed rate of return or USF budget calculations imposed by the Report & Order. Rather, the need to regularize TCT's accounting treatment for its investment is still required so that it can be placed on an equal footing with other rate-of-return companies.

I requested that the staff proceed to decide the petition and offered to provide any additional information that the Commission may require. Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced docket.

Sincerely,

/s/ Gregory J. Vogt

Gregory J. Vogt
Counsel for Tri-County Telephone Association, Inc.

cc: Pamela Arluk