

Law Office of  
Richard A. Finnigan  
2112 Black Lake Blvd. SW  
Olympia, Washington 98512

Richard A. Finnigan  
(360) 956-7001  
rickfinn@localaccess.com

Candace Shofstall  
Legal Assistant  
(360) 753-7012  
candaces@localaccess.com

---

April 28, 2016

**VIA E-FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Room TW-A325  
Washington, DC 20554

Re: WC Docket No. 10-90 - Comments of Cascade Utilities, Inc., d/b/a Reliance Connects, Beaver Creek Cooperative Telephone Company and Colton Telephone Company d/b/a ColtonTel

Dear Ms. Dortch:

I represent Cascade Utilities, Inc., d/b/a Reliance Connects ("Reliance Connects"), Beaver Creek Cooperative Telephone Company ("BCT") and Colton Telephone Company d/b/a ColtonTel ("ColtonTel"). This is a challenge under the challenge process set out in DA 16-378 issued under WC Docket No. 10-90. This challenge has two parts. The first is to certain census blocks where the FCC Form 477 data for purposes of the Alternative Connect America Cost Model (A-CAM) shows that the census blocks are jointly served in each case by two of the above-listed companies. The second part is a challenge to two census blocks that are shown in the FCC Form 477 data as being served in one instance by ColtonTel and in the other instance by BCT, but which are entirely within Reliance Connects service area and are not, in fact, served by ColtonTel or BCT.

For ease of reference, the study area codes are listed for each of the companies. The study area codes are as follows: (1) Reliance Connects - 532371; (2) BCT - 532359; and (3) ColtonTel - 532364. Each of the three companies provides voice and broadband services in their respective study areas.

As to the census blocks that are shown as shared, the following are the census blocks involved. ColtonTel and Reliance Connects are shown in FCC Form 477 data as both serving census blocks 410050241003013, 410050241003018, 410050241003032, 410050241003136, and 410050241003137. The FCC Form 477 data shows two census blocks as being served by both BCT and Reliance Connects. Those two census blocks are 410050236002027 and

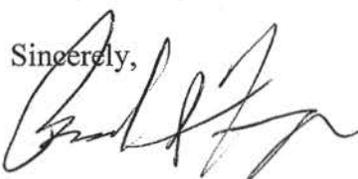
410050236002010.

Each of the three companies serves the listed census block as an incumbent local exchange carrier (ILEC). As such, each serves only the portion of the census block within their ILEC service territory. In addition, each of the three companies receives federal support in some form or another. By referencing the USAC report HCO1 for the first quarter of 2016, at line 1355, BCT is shown as receiving CAF-ICC support and ICLS support. In the same report at line 1359, ColtonTel is showing as receiving CAF-ICC support, HCL support, and ICLS support. The same report shows Reliance Connects at line 1361 as receiving CAF-ICC support, HCL support and ICLS support. Further, each of the three companies receives support from the Oregon Universal Service Fund.<sup>1</sup> Thus, none of the three companies can be considered to be an "unsubsidized competitor" for A-CAM purposes.

On the second matter, FCC Form 477 data shows census block 410050241003033 as being served by ColtonTel even though it is entirely within the Reliance Connects service area. Attached as Exhibit 1 is a letter from Mr. Steve R. Krogue, General Manger of ColtonTel verifying that they do not provide service in that census block and stating that the 477 data will be corrected.

Along the same lines, FCC Form 477 data shows that census block 410050236002023 is served by BCT although the census block is entirely within Reliance Connects service area. Attached as Exhibit 2 is a letter from Mr. Paul Hauer, President/CEO of BCT stating that BCT does not serve in that census block and that the Form 477 data will be corrected.

Based on the foregoing, each of the three companies respectfully request that the census block data be clarified to show the absence of an unsubsidized competitor and that the final version of the A-CAM incorporate that corrected data. For ease of reference, pursuant to Footnote 14 of DA 16-378, the Federal Registration Number or FRN for each of the three companies is as follows: BCT (0001-5658-29); ColtonTel (0004-9539-80); and Reliance Connects 0003-7162-55).

Sincerely,  
  
RICHARD A. FINNIGAN

---

<sup>1</sup> This can be verified by going to [www.puc.state.or.us/ousf/Pages/index.aspx](http://www.puc.state.or.us/ousf/Pages/index.aspx) and then clicking on the "OUSF Support Per ILEC Wire Center" tab.