

Law Offices of Gregory J. Vogt, PLLC

103 BLACK MOUNTAIN AVE.
SUITE 11
BLACK MOUNTAIN, NC 28711

www.vogtlawfirm.com

Gregory J. Vogt
828.669.2099 (office)
gvogt@vogtlawfirm.com

June 17, 2016

EX PARTE PRESENTATION

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

Re: Sandwich Isles Communications, Inc., Petition for Declaratory
Ruling, WC Docket No. 09-133

Dear Ms. Dortch:

On June 16, 2016, on behalf of the National Exchange Carrier Association, Inc. ("NECA"), Regina McNeil and Robert Deegan, both of NECA, and I met with Jim Bird, Douglas A. Klein, and Sarah Stone (by telephone), all of the Office of General Counsel, in the above-captioned matter.

I urged the Commission to take prompt action because the refresh comment period is now complete. I described the background and procedural facts concerning the above-captioned proceeding as described in NECA Refresh Comments at pages 2-8, 22-24 (filed Apr. 28, 2016), filed in the above-captioned docket.

NECA indicated that Sandwich Isles Communications, Inc.'s ("SIC's") characterization of the legal precedent concerning the used and useful doctrine is incorrect, as outlined in NECA Refresh Reply Comments at pages 2-5 (filed May 9, 2016), filed in the above-captioned docket. NECA's position with respect to NECA's current view on the used and useful nature of the Paniolo cable system lease and related expenses. This position was fully described in NECA Refresh Comments at pages 15-16, 19 and NECA Refresh Reply Comments at pages 11-13. NECA believes that service to Sandwich Isles Communications, Inc. customers would continue, even with a reduced revenue requirement that is consistent with reasonable cost recovery.

Law Offices of Gregory J. Vogt, PLLC

Marlene H. Dortch
June 17, 2016
Page 2

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 National Exchange Carrier Association, Inc.

cc: Jim Bird
Douglas A. Klein
Sarah Stone