

Law Offices of  
**Bennet & Bennet, PLLC**  
1000 Vermont Avenue, N.W., 10<sup>th</sup> Floor  
Washington D.C. 20005

EX PARTE OR LATE FILED

Caressa D. Bennet  
Michael R. Bennet  
Marjorie G. Spivak  
Gregory W. Whiteaker  
Brent H. Weingardt  
Howard S. Shapiro  
Donald L. Herman, Jr.  
Kelvin L. Reaves<sup>\*\*</sup>  
Rebecca L. Murphy

Phone (202) 371-1500  
Fax (202) 371-1558

[www.bennetlaw.com](http://www.bennetlaw.com)

Senior Communications Consultants  
G. Kent Larsen  
Ken C. Johnson

\*Admitted in MD and CT Only  
+Practice is limited to matters and proceedings  
before federal courts and agencies

September 28, 2001

**VIA HAND DELIVERY**

Magalie Roman Salas,  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RECEIVED

SEP 28 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: Western Wireless Corporation Petition to Reject Rural Telephone  
Company Self-Certification Filed by Valor Telecommunications  
Southwest, LLC  
WT Docket No. 00-239 /  
DA 00-1882**

***Ex Parte Presentation***

Dear Ms. Salas:

Leaco Rural Telephone Cooperative, Inc. ("Leaco"), by its attorneys, hereby respectfully submits this supplement to its comments and reply comments filed in the above-referenced proceeding. Specifically, Leaco wishes to inform the Federal Communications Commission ("FCC" or "Commission") of Valor Telecommunications Southwest, LLC's ("Valor") pro-competitive and cooperative actions in its business dealings with Leaco in New Mexico.

Valor, by its actions, has demonstrated a commitment to working with Leaco in New Mexico in order to establish a robust, competitive business relationship. Valor has worked to assign Interconnection Agreements negotiated by its predecessor, GTE Southwest. It has become apparent to Leaco since filing its comments in this proceeding that Valor is seeking self-certification as a rural telephone company in order to upgrade the high cost exchanges it purchased from GTE Southwest, rather than to invoke the Section 251(f) "rural exemption" in order to avoid competition. In this spirit of cooperation, Valor and Leaco have been able to settle certain interconnection disagreements on a going forward basis, commencing September 1,

No. of Copies rec'd 014  
List ABCDE

September 28, 2001  
Page 2

2000 and Leaco is pleased with Valor's efforts to expedite interconnection, allowing Leaco to begin competing with Valor.

In sum, Leaco is impressed by Valor's commitment to universal service and the cause of rural competition, and Leaco does not oppose Valor's self certification under federal law as a "rural telephone company" in New Mexico.

In accordance with Section 1.1206 of the Rules and Regulations of the FCC, one original and one copy of this letter are being filed with your office. Please contact the undersigned with any questions.

Respectfully submitted,



Caressa D. Bennet

cc: Jack Zinman  
Katherine Schroder  
Katie King  
Carol Matthey