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GRIGGS COUNTY TELEPHONE COMPANY

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April 10, 2002

Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

RE: Letter of Appeal to the Federal Communications Commission  
Docket Nos. 96-45 and 97-21

Legal Reporting Name: Griggs County Telephone Company

Filer 499 ID: 805695

To Whom It May Concern:

We are appealing the Universal Service Administration Company's decision to reject Griggs County Telephone Company's revised FCC Form 499-A for the period January 1- December 31, 1999. We request that the Revised FCC Form 499-A for that period be accepted as final, and the contribution of \$27,087.69 paid by Griggs County Telephone Company to USAC based on the original FCC Form 499-A be refunded.

We have filed a revised FCC Form 499-A for the period January 1-December 31, 1999 because the original filing was completed incorrectly. This form was completed incorrectly as the FCC Form 499-A for the period January 1-December 31, 1999 was the first filing of its type, and the preparer misunderstood the complex instructions and also as this was the first filing of this type there was no basis for comparison. The errors contained in the original filing of the FCC Form 499-A for that period grossly overstated line 420 (a) and Line 420 (d), the Universal Service Contribution Base Revenues which caused us to loose the De Minimis exemption status for that period. This was discovered by our auditors upon a review of the FCC Form 499-A for the period January 1-December 31, 2000. Once discovered, we filed revisions of both of these forms on July 27, 2001.

We realize that, as pointed out in USAC's denial of our original appeal, the revision of our FCC Form 499-A was filed beyond USAC's revision timeline, but it was filed within three months of the USAC requirement and was filed as soon as the error was discovered. We are appealing to the FCC based on the fact that as soon as this error was discovered, we did in good faith, file a revised Form and have been attempting to work with USAC over the last eight months to resolve this matter. When we originally filed our revision and explained our situation to USAC, we were told that they would review it and get back to us within 90 days, which turned out to be eight months. We are a small rural LEC serving 2,200 access lines in central North Dakota who

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normally qualifies for De Minimis status, however due to this filing error, we have been penalized in the amount of \$27,087.69.

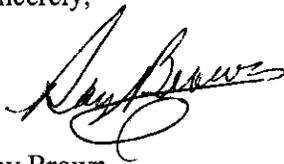
We were not aware of the NECA settlement process concerning Universal Service Contributions, and therefore did not receive settlements from NECA for the contributions.

If you have any questions on this appeal, or the revised FCC Form 499-A for the period January 1-December 31, 1999, please contact:

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Olsen-Thielen & Co., LTD  
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Email: [cjeffrey@olsen-thielen.com](mailto:cjeffrey@olsen-thielen.com)

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Brown", written in a cursive style.

Ray Brown  
General Manager  
Griggs County Telephone Company  
Cooperstown, North Dakota