

CLARK HILL
PLC
ATTORNEYS AT LAW

212 East Grand River Avenue
Lansing, Michigan 48906
Tel. (517) 318-3100 ■ Fax (517) 318-3099
www.clarkhill.com

Don L. Keskey
Phone: (517) 318-3014
E-Mail: dkeskey@clarkhill.com

April 3, 2008

Mr. Gary Seigel
Federal Communications Commission
Wireline Competition Bureau
445 12th Street SW
Washington, DC 20554

RE: CC Docket 96-45

Dear Mr. Seigel:

This letter provides follow-up information concerning a matter discussed in the ex parte conference associated with the opposition of Allband Communications Cooperative (“Allband”) to the petition of Osirus Communications, Inc. for waivers of certain Commission rules in Docket No. 96-45. Allband’s filings in Docket No. 96-45 also requested the Commission to clarify that the waivers Allband obtained in WC Docket No. 05-174, order dated August 11, 2005, apply to the unserved areas Allband is planning to serve.

Allband has now been granted ETC status to serve the additional unserved areas identified by Allband in its filings in Docket No. 96-45, as discussed in the ex parte conference. A copy of the March 11, 2008 order of the Michigan Public Service Commission granting Allband this ETC status is attached for your review. The order is also available via the link to the MPSC website: http://www.cis.state.mi.us/mpsc/orders/comm/2008/u-15492_03-112008.pdf.

Allband has also completed its extensive financial forecasts and projections, and customer surveys, site surveys, and engineering design work to promptly commence construction of high quality communications facilities and services in the unserved areas. Please find in this regard the attached March 10, 2008 letter from the engineering firm, Kadrmas, Lee, & Jackson, and the March 14, 2008, letter from the financial and regulatory consulting firm, Fred Williamson & Associates. Allband has thus completed the necessary tasks to promptly file a RUS loan application to obtain the necessary funds to complete construction of facilities and implement service in the unserved areas. Allband is thus fully prepared to commence construction in the unserved areas as soon as the Commission confirms Allband’s ILEC status in the additional unserved areas and Allband receives its RUS loan.

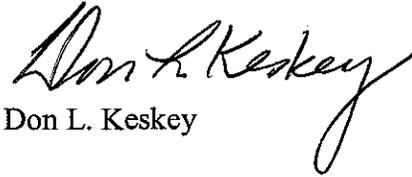
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Mr. Gary Seigel
April 4, 2008
Page 2

Please advise me or Allband General Manager Ron Siegel (Phone: 989-369-9870) if you need further information.

Very truly yours,

CLARK HILL PLC

A handwritten signature in black ink, appearing to read "Don L. Keskey". The signature is written in a cursive style with a large, sweeping flourish at the end.

Don L. Keskey

DLK:pat

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter of the application of)
ALLBAND COMMUNICATIONS COOPERATIVE)
for expansion of its designated eligible)
telecommunications carrier service areas)
in Michigan.)
_____)

Case No. U-15492

At the March 11, 2008 meeting of the Michigan Public Service Commission in Lansing,
Michigan.

PRESENT: Hon. Orjiakor N. Isiogu, Chairman
Hon. Monica Martinez, Commissioner
Hon. Steven A. Transeth, Commissioner

FINDINGS OF FACT

On December 21, 2007, Allband Communications Cooperative (Allband) filed an application to expand its Eligible Telecommunications Carrier (ETC) designated service area for universal support purposes to include additional service areas for which Allband is licensed to provide basic local exchange service, under Section 214(e)(2) of the federal Communications Act of 1934, as amended, 47 USC § 214(e)(2).

Allband is an existing incumbent local exchange carrier (ILEC) originally licensed to provide services within the Robbs Creek Exchange Service Area on December 2, 2004 in Case No. U-14200. On November 8, 2007, the Commission approved a license expansion to include seven additional service areas per Allband's August 31, 2007 application in Case No. U-15385.

In an order dated November 10, 2005 in Case No. U-14659, the Commission designated Allband as an ETC in the previously unserved territory of Robbs Creek Exchange. Allband's application now asks that their ETC designation be expanded to include the seven new unserved territories in Alcona, Alpena, Presque Isle, Montmorency, Gladwin, Ogemaw, and Oscoda Counties for which the license expansion was approved.

Allband requests that the Commission enter an order immediately designating the additional exchanges listed below as being included in its designated service area and thus eligible for universal service fund (USF) support.

- Big Creek Exchange – Oscoda and Ogemaw Counties
- Fox Creek Exchange – Presque Isle County
- McDonald Creek Exchange – Alcona and Iosco Counties
- Mosquito Alley Exchange – Gladwin County
- Old Baldy Exchange – Oscoda County
- Thunder Bay Exchange – Presque Isle County
- Upper Tomahawk Creek Exchange – Presque Isle and Montmorency Counties

Finally, Allband asserts that the Commission may act on its application without the necessity of a public hearing.

CONCLUSIONS OF LAW

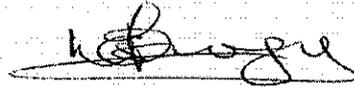
After reviewing Allband's application, the Commission finds that it should be granted because the Commission is persuaded that inclusion of the additional exchanges in Allband's ETC designation promotes the availability of universal service to currently unserved areas and is in the public interest. The Commission concludes, as it did in its November 20, 2001 order in Case No. U-13145, p. 4, that "it need not solicit comment on the application, which would only further delay action on the application."

THEREFORE, IT IS ORDERED that the application filed by Allband Communications Cooperative for designation as an eligible telecommunications carrier for purposes of universal service fund support is granted.

The Commission reserves jurisdiction and may issue further orders as necessary.

Any party desiring to appeal this order must do so by the filing of a claim of appeal in the Michigan Court of Appeals within 30 days of the issuance of this order, under MCL 484.2203(12).

MICHIGAN PUBLIC SERVICE COMMISSION



Orjiakor N. Isiogu, Chairman



Monica Martinez, Commissioner

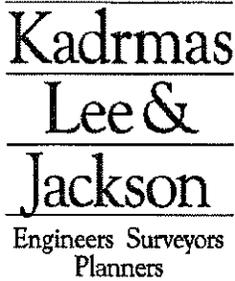


Steven A. Transeth, Commissioner

By its action of March 11, 2008.



Mary Jo Kunkle, Executive Secretary



March 10, 2008

Gary Seigel
TAPD Staff
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: Allband Communication Cooperative Un-served Area Design, Michigan

Dear Gary Siegel:

In reference to the un-served areas in north eastern Michigan (Fox Creek, Upper Tomahawk, Big Creek, Old Baldy, McDonald Creek, Mosquito Alley and Thunder Bay Exchanges) the design and budgetary costs for these exchanges are complete. This design is based on actual customer surveys of these areas and site surveys for optimal cable placement.

This design is based on Fiber-to-the-Home (FTTH) which for green field applications is the wisest solution. Wireless design was reviewed but due to the wooded areas and its negative impact on coverage, the cost of feeders (fiber or microwave), and tower costs it was determined it did fit the long term goals of Allband for the overall costs versus bandwidth. The FTTH design is the most fitting solution for the goals of Allband and its members.

Allband is ready to start constructing once funding is secured.

If you have questions please contact me at (701) 355-8419.

Respectfully,

Kadrmass, Lee & Jackson, Inc.

/s/ Lanny J. Harris

Lanny J. Harris
Project Manager

cc: Ron Siegel, Allband

701 355 8400
128 Soo Line Drive
PO Box 1157
Bismarck, ND 58502-1157
Fax 701 255 0943
www.kljeng.com
Kadrmass, Lee & Jackson, Inc.
A KLJ Solutions Company

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FWA

FWA, FRED WILLIAMSON & ASSOCIATES, INC.
FINANCIAL AND REGULATORY PROFESSIONALS

March 14, 2008

Gary Seigel
Federal Communications Commission
Wireline Competition Bureau
445 12th Street SW
Washington, DC 20554

In CC Docket 96-45, Allband Communications Cooperative (Allband) has filed for the immediate denial of Osirus Communications, Inc. (Osirus) petition for waivers of the Commission's Rules to participate in the NECA pools and to obtain accelerated USF support. Allband is currently being delayed admission into the NECA pool and potential USF support for several unserved areas in upstate Michigan until the FCC has ruled on the Osirus petition. This is a result of NECA concern that there could possibly be two incumbent carriers both designated for these areas. These territories are currently without service and delaying the consumer's basic local phone service is obviously not in the public interest.

Fred Williamson and Associates, Inc. (FWA) has prepared several forecasts and projections regarding Allband efforts to expand into several unserved areas in upstate Michigan. These areas, comprising roughly 240 square miles, including portions of Alcona, Alpena, Presque Isle, Montmorency, Gladwin, Ogemaw and Oscoda counties, are currently unserved and required extensive cost analysis to aid in the preparation of RUS loan design papers as well as design for future filings to the National Exchange Carrier Association (NECA).

Through the course of these forecasts and projections, FWA has run multiple analyses of Allband's engineering and financial plans as well as anticipated RUS and USAC forecasts to aid in the rapid and comprehensive deployment of fiber facilities to the aforementioned unserved areas.

Financially, assuming membership in the NECA pool and receipt of USF funds, Allband is in the position to begin the rapid and ubiquitous deployment of fiber facilities to all of the areas analyzed. However, Allband must delay any activity until the FCC acts on the Osirus petition. These further delays of deployment will cause undue financial burden on Allband because much of the initial cost of engineering and design work has already been spent.

Sincerely,

Tim Morrissey, Vice President
Fred Williamson and Associates, Inc.