

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Alpine Cable Television, LC	)	CSR-7832-Z
Atkins Cablevision, Inc.	)	CSR-7840-Z
Citizens Mutual Telephone Cooperative	)	CSR-7834-Z
City of Bellevue (Iowa)	)	CSR-7835-Z
Cooperative Telephone Company	)	CSR-7836-Z
Cooperative Telephone Exchange	)	CSR-7837-Z
Dumont Telephone Company	)	CSR-7838-Z
Dunkerton Telephone Cooperative	)	CSR-7839-Z
Farmers Mutual Telephone Company	)	CSR-7841-Z
Griswold Cooperative Telephone Company	)	CSR-7842-Z
Interstate Cablevision Company	)	CSR-7843-Z
Mechanicsville Telephone Company	)	CSR-7847-Z
Minburn Cablevision, Inc.	)	CSR-7846-Z
Mutual Telephone – Morning Sun	)	CSR-7851-Z
Northland Communications, Inc.	)	CSR-7833-Z
Sharon Telephone Company	)	CSR-7845-Z
Western Iowa Telephone Association	)	CSR-7844-Z
	)	
Group Petition for Waiver of Section	)	
76.1204(a)(1) of the Commission’s Rules	)	
	)	
Implementation of Section 304 of the	)	CS Docket No. 97-80
Telecommunications Act of 1996	)	
	)	
Commercial Availability of Navigation Devices	)	

**REPLY COMMENTS**

The above-captioned Petitioners<sup>1</sup> respectfully file these Reply Comments regarding their group Petition for a waiver of Section 76.1204(a)(1) of the Commission’s rules<sup>2</sup> until July 1, 2010. As discussed in their Petition, a waiver is necessary because navigation devices that are

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<sup>1</sup> Farmers Mutual Telephone Company’s name was incorrectly listed as “Farmers Cooperative Telephone Company” in the Commission’s Special Relief and Show Cause Petitions Public Notice, FCC File No. CSR-7841-Z, Report No: 0246 (rel. Apr. 11, 2008). Farmers Mutual respectfully requests that the correct name be substituted in subsequent public notices and orders.

<sup>2</sup> 47 C.F.R. § 76.1204(a)(1).

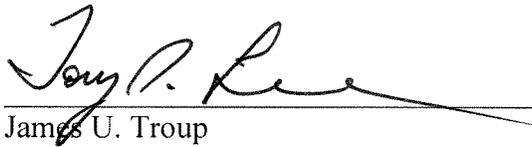
both compatible with the Petitioners' proposed all-digital video distribution networks and that comply with Section 76.1204(a)(1) are not currently available, and progress towards developing an open conditional access standard for Internet Protocol Television ("IPTV") – the video platform the Petitioners will use to provision video service to subscribers – is at least two years away.

Grant of the waiver requests would not undermine the goal of Section 76.1204(a)(1) because the Petitioners, due to their small size and limited resources, have no ability to influence the design or development of navigation devices. In contrast, denial of the requested waivers would undermine the Act's overall objective of deploying advanced telecommunications capability to all Americans because the Petitioners have committed to deploying all-digital video systems and, absent a waiver, they would be prohibited from offering any video service to consumers in the rural communities they plan to serve. Grant of the limited waivers requested herein is therefore justified in order to enable the Petitioners to begin providing new and advanced all-digital video service in the small rural communities they seek to serve.

No comments have been filed in response to Petitioners' request, and, as discussed in the Petition, technical standards for IP-based video systems in the U.S., such as that used in Petitioners' video distribution systems, are at least two years away. Navigation devices that are compatible with the Petitioners' all-digital video distribution networks and that comply with the integration ban are not currently available to the Petitioners, and technical standards that would be a prerequisite to designing compliant conditional access devices for IPTV video systems are not expected to be available within the next two years for incorporation by the Petitioners' middleware providers and other vendors.

Petitioners had hoped to deploy service in the latter part of the first quarter of 2008; however, they were unable to do so because they did not have a waiver of Section 76.1204(a)(1) from the Commission, and compliant IPTV equipment is not currently available. Petitioners respectfully request that the Commission grant a waiver as soon as possible to allow them to deploy service in their rural communities in the second quarter of 2008 – and preferably in May 2008 shortly after the expiration of the reply comment deadline on May 12, 2008 – so that they can commence video service in rural areas that otherwise would not have access to advanced IP-based cable and broadband services. Petitioners further renew their request that the Commission permit them to request further extensions without the requirement to also submit a new filing fee in light of the uncertainty of the development timeline for the IPTV conditional access standards and availability of equipment.

Respectfully submitted,



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