

Tony S. Lee

June 18, 2008

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**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Iowa Network Services, Inc. et al.  
Notice of Oral Ex Parte Presentation  
CS Docket No. 97-80; CSR-7832-Z; CSR-7833-Z; CSR-7840-Z; CSR-7835-Z; CSR-7836-Z; CSR-7837-Z; CSR-7838-Z; CSR-7839-Z; CSR-7841-Z; CSR-7842-Z; CSR-7843-Z; CSR-7844-Z; CSR-7845-Z; CSR-7846-Z; CSR-7847-Z; CSR-7851-Z; CSR-7886-Z; CSR-7887-Z; CSR-7888-Z; CSR-7889-Z; CSR-7890-Z; CSR-7891-Z; CSR-7892-Z; CSR-7893-Z; CSR-7894-Z; CSR-7895-Z; CSR-7896-Z; CSR-7897-Z; CSR-7898-Z; CSR-7899-Z; CSR-7903-Z

Dear Ms. Dortch:

Today, the undersigned representative of Iowa Network Services, Inc. ("INS") and Petitioners in the above-referenced Cable Special Relief proceedings<sup>1</sup> met with Elizabeth Andron of Commissioner Martin's Office to discuss their pending requests for waiver of Section 76.1204(a)(1). Specifically, Petitioners request a waiver to continue using cable TV set-top boxes in their all-digital systems that may not comply with the FCC's integration ban rules, and to deploy such units in new systems that are ready to commence service but for the lack of a waiver from the FCC to use IPTV set-top boxes in their all-digital systems.

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<sup>1</sup> The Petitioners in the above-referenced Cable Special Relief proceedings are: Alpine Cable Television, LC, Atkins Cablevision, Inc., Citizens Mutual Telephone Cooperative, City of Bellevue (Iowa), Cooperative Telephone Company, Cooperative Telephone Exchange, Dunkerton Telephone Cooperative, Dumont Telephone Company, Farmers Mutual Telephone Company, Griswold Cooperative Telephone Company, Interstate Cablevision Company, Mechanicsville Telephone Company, Minburn Cablevision, Inc., Mutual Telephone – Morning Sun, Northland Communications, Inc., Sharon Telephone Company, Western Iowa Telephone Association, Bernard Telephone Company Inc., Colo Telephone Company, Coon Creek Telephone Company and Coon Creek Telecommunications Corp., F & B Communications, Inc., Farmers Cooperative Telephone Company, Heart of Iowa Communications Cooperative, Kalona Cooperative Telephone Company, LaMotte Telephone Company, Local Internet Service Company, Mahaska Communication Group, LLC, Radcliffe Telephone Company, Inc., South Slope Cooperative Telephone Company, Wellman Cooperative Telephone Association, West Liberty Telephone Company, and Winnebago Cooperative Telecom Association

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INS informed the FCC that a compliant IPTV solution is at least two years away, and that the lack of the requested waivers would preclude all-digital video and related services from being deployed in rural areas. INS also emphasized that the rural video systems that are the subject of the requested waivers are either already providing service, or are ready to deploy service. INS urged the Commission not to delay a decision on the waiver requests pending the resolution of the petition for waiver filed by the National Telecommunications Cooperative Association. A delay in acting on the Petitions would hinder, and indeed, halt the provision of much-needed advanced all-digital IPTV-based video and related service, such as high-speed Internet access, in historically underserved rural areas in Iowa.

A copy of a handout distributed at the meeting, which depicts the timeline of the waiver petitions filed and granted in 2007, and the currently pending waiver extensions and new waivers filed in 2008, are attached hereto.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter and a handout given at the meeting is being filed for inclusion in the above-referenced dockets. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,



Tony S. Lee

cc: Elizabeth Andrion  
Brendan Murray

## TIMELINE OF IOWA CABLE COMPANY WAIVERS

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### 2007 Waivers

- March 2007: Petitions filed for waiver of Section 76.1204(a)(1) for various Iowa cable companies
- April & May 2007: FCC issues public notices regarding special relief and show cause petitions filed by the Iowa cable companies
- June 2007: FCC issues Order granting a waiver of Section 76.1204(a)(1) until July 1, 2008

### 2008 Waiver

- March 2008: Group petition for waiver of Section 76.1204(a)(1) filed for various Iowa cable companies (Group I Petition) for new operations (these companies did not receive a waiver in 2007 because they did not have cable operations in 2007)
- April 2008: FCC issues public notice regarding special relief and show cause petitions filed by the Iowa cable companies in the Group I Petition
- May 2008: Group petition filed for a two year extension of the waiver granted to Iowa cable companies in June 2007 (Group II Petition) (these companies did receive a waiver in 2007)
- May 2008: FCC issues public notice regarding special relief and show cause petitions filed by the Iowa cable companies in the Group II Petition