



Mountain Telephone

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Received & Inspected

NOV 3 - 2008

FCC Mail Room

October 27, 2008

The Honorable Jonathan S. Adelstein, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

WC Docket Nos.: 05-337; 03-109
CC Docket Nos.: 01-92; 96-45

Dear Commissioner Adelstein:

Mountain Telephone who operates in the Commonwealth of Kentucky has very serious concerns about the proposal that will be before the Commission for a vote on November 4th. While we believe that reform is necessary, doing so without allowing us to see the proposal and also allowing us to comment on the proposal could prove to be disastrous and we believe the vote should be "No" on November 4th.

As you know, the Intercarrier compensation system is a regulated system that allows companies to compensate each other for the use of their respective networks. This system is vital to the survival of our company and the communications network. Reform of this system must be conducted with great caution to avoid inflicting unintended and unforeseen harm to both the citizens of Kentucky and the companies that serve it.

While we respect the expertise of you and your staff, it is incomprehensible to think that a multi-billion dollar overhaul of the telecommunications economy would be designated seemingly in secret and possibly voted into law on November 4th.

Meanwhile, it is our understanding that nobody outside the FCC has seen this 167-page plan. Again, we respectfully request that there be a "no" vote on November 4th or at a minimum, this proposal be published in the Federal Register allowing us and other companies time to review and comment on the proposal.

This proposal, we believe, would cripple us and other companies that together serve most of the homes in rural Kentucky likely leading to less broadband deployment, to layoffs of employees and possible loss of telephone and internet service in certain areas. We have even heard that there are some predictions that adoption of the current plan would

**Your Rural
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necessitate a government bailout just to ensure that service continues to existing customers.

Sincerely,

W A Gillum

W. A. Gillum
General Manager

Cc: Chairman Kevin J. Martin
Commissioner Michael J. Copps
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell