

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

In the Matter of

Jurisdictional Separations and Referral to the  
Federal-State Joint Board

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**CC Docket No. 80-286**

**COMMENTS OF TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.**

Texas Statewide Telephone Cooperative, Inc. (TSTCI) offers these comments in response to the Notice of Proposed Rulemaking with regard to extending until June 20, 2010, the current freeze of Part 36 category relationships and jurisdictional cost allocation factors. TSTCI is an association representing 38 small, rural incumbent telephone companies and cooperatives in Texas (see Attachment 1).

All TSTCI member companies are under rate-of-return regulation and comply with the Part 36 jurisdictional separations process for developing their interstate revenue requirement. TSTCI strongly supports extending the existing Part 36 freeze. To require small rate-of-return companies to revert to the pre-freeze separations process at this time would be extremely disruptive and costly for the small companies as well as their cost consultants.

Reverting to the pre-freeze separations process would cause a hardship because it is too late in the year to revert to the pre-freeze separations rules; considerable disruption not only to the small ILECs but to the National Exchange Carrier Association (NECA) and the Universal Service Administrative Company (USAC) would result. At this time most small companies and their cost consultants currently lack the necessary software to implement the pre-freeze cost

allocation process, and small companies lack trained personnel who could implement the jurisdictional separations process on relatively short notice.

TSTCI supports extending the freeze for a period of at least one year to allow adequate time for development of comprehensive separations reform. In fact, TSTCI would not be opposed to a longer extension period so that there is sufficient time for all parties to consider and comment on comprehensive separations reform.

In addition, TSTCI would support allowing companies to make a one-time decision to change from frozen status pending the outcome of comprehensive separations reform. In general, TSTCI supports providing small rate-of-return carriers as much flexibility as possible with respect to the jurisdictional separations process.

TSTCI appreciates this opportunity to provide comments on an issue that is so important to its member companies.

Respectfully submitted,

A handwritten signature in black ink that reads "Cammie Hughes". The signature is written in a cursive, flowing style.

Texas Statewide Telephone Cooperative, Inc.

By: Cammie Hughes  
Authorized Representative  
April 17, 2009

**TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.**

Alenco Communications, Inc.  
Big Bend Telephone Company, Inc.  
Brazos Telecommunications, Inc.  
Brazos Telephone Coop., Inc.  
Cameron Telephone Company  
Cap Rock Telephone Coop., Inc.  
Central Texas Telephone Coop., Inc.  
Coleman County Telephone Coop., Inc.  
Colorado Valley Telephone Coop., Inc.  
Community Telephone Company, Inc.  
Cumby Telephone Coop., Inc.  
Dell Telephone Coop., Inc.  
E.N.M.R. Telephone Coop., Inc.  
Eastex Telephone Coop., Inc.  
Electra Telephone Company  
Etex Telephone Coop., Inc.  
Five Area Telephone Coop., Inc.  
Ganado Telephone Company, Inc.  
Hill Country Telephone Cooperative, Inc.  
Industry Telephone Company, Inc.  
La Ward Telephone Exchange, Inc.  
Lake Livingston Telephone Company  
Lipan Telephone Company, Inc.  
Livingston Telephone Company  
Mid-Plains Rural Telephone Coop., Inc.  
Nortex Communications, Inc.  
Panhandle Telephone Coop., Inc.  
Peoples Telephone Coop., Inc.  
Poka Lambro Telephone Coop., Inc.  
Riviera Telephone Company, Inc.  
Santa Rosa Telephone Coop., Inc.  
South Plains Telephone Coop., Inc.  
Tatum Telephone Company  
Taylor Telephone Coop., Inc.  
Wes-Tex Telephone Coop., Inc.  
West Plains Telecommunications, Inc.  
West Texas Rural Tel. Coop., Inc.  
XIT Rural Telephone Coop., Inc.