



May 11, 2009

Robert McDowell
Commissioner
Federal Communications Commission

Re: Allband Communications Cooperative Request for Assistance

CC Docket 96-45: In the Matter of Osirus Communications, Inc.'s Petition for Waivers of the Commission's Rules to Participate in NECA Pools and Tariffs and to Obtain Accelerated Universal Service Fund Support

Dear Commissioner McDowell:

I write you to kindly request your assistance with the pending FCC petition listed above that is preventing hundreds of Michigan residents from obtaining traditional landline telephone service.

Michigan currently has approximately 15 small-unassigned areas in the lower and Upper Peninsula that are not served by an incumbent local exchange carrier. Specifically, the residents and businesses in these areas cannot request traditional landline telephone, because the infrastructure to provide service is not available.

In 2003, our President, John Reigle started Allband Communications Cooperative, a non-profit corporation and the first telephone cooperative in the state of Michigan to serve the largest unassigned rural area, which is now called the Robbs Creek Exchange. John's primary focus was to provide 911 services to the public after hearing many tragic stories that involved the inability to call for help because a phone was not available. Allband obtained the necessary State and FCC waivers to serve this area as an ILEC and currently utilizes NECA and the USF cost recovery mechanisms to serve almost 100 residents with a state of the art, fiber to the home system that provides advanced communications, including telephony, security and high-speed Internet.

In 2007, Allband began the expensive process of engineering a new network that would serve the seven new unassigned areas referenced in the above petition, which surround Allband's Robbs Creek exchange. Because the areas are unserved,

Allband has planned to comply with the Commission's Skyline Order¹, which would allow Allband to add these new unassigned areas to our current study area without the need for additional FCC waivers. When the State license to serve these areas was approved, Allband submitted the necessary paperwork to NECA so that the unserved areas in question could be added to Allband's current study area, which would allow us to participate in NECA tariffs and recovery pools.

At the same time, a Michigan CLEC called Osirus Communications also applied for and received a license from the State of Michigan to serve the same areas and has filed a petition for the same FCC waivers that Allband already has with the FCC. Due to the State license and the ILEC waiver that is pending at the FCC, NECA will not approve our study area request due to the chance that two ILECs could be designated in the same areas. Since the Michigan Public Service Commission claims to have no authority over ILEC designation, the decision of who has ILEC rights to these seven unserved areas rests with the FCC.

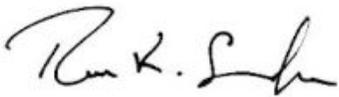
Allband's mission and expertise is the construction of advanced telecommunication networks in rural areas. Our cooperative has spent years making our business model work. We are now cash flow positive and continually try to reinvest in rural unserved areas that desperately need access to reliable 911, advanced telephony and high-speed Internet. We feel that allowing a CLEC with minimal rural construction experience to build in these areas near us would only delay a mission that has already been delayed far too long. We appeal to the FCC to consider the public interest and support Allband's mission to bring advanced services to rural areas. Allband is committed to enhancing the quality of life, economic development, health care and education of our community and Allband intends to share our goals and success with the seven areas referenced in the Osirus petition.

Allband, a current USDA Rural Development borrower (RUS) is also planning on applying for an American Recovery and Reinvestment Act (ARRA) grant to serve these areas, but cannot proceed without a decision from the FCC. The residents of these areas have been waiting decades for telephone service and since we originally contacted the residents about future service, have had to wait over a year with no solution in sight.

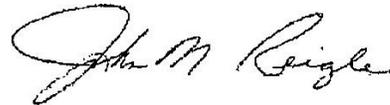
¹ Fn8 – See M&L Enterprises, Inc., d/b/a Skyline Telephone Company, Petition for Waiver of Sections 36.611, 36.612, and 69.2(hh) of the Commission's Rules, CC Docket No. 96-45, Order, 19 FCC Rcd 6761 (2004).

The Board of Directors and management of Allband Communications kindly request that the Honorary Commissioners of the FCC, contact their legal advisors and the FCC Wireline Competition Bureau and request an expedited decision on this matter so that the residents in these debated areas can finally receive reliable 911 service and advanced telecommunication services. We hope that a decision can be made in time for Allband to utilize the broadband grants that have been appropriated by the Obama Administration through the ARRA grant process.

Best Regards,



Ron K. Siegel
General Manager



John M. Reigle
President

Cc: Nicholas Alexander