

February 11, 2010



Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

**Re: Petition of Partner Communications Cooperative for
Forbearance from Section 54.305(b) and (d) the Universal
Service Rules
WC Docket No. 05-337**

Everett Halsted
Director

Board of
Directors:

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President

Jim Figgins
Vice President

Lori Martin
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Secretary

Mike Kielly

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Marcia Quick

Dear Ms. Dortch

The State Center Development Association (SCDA) at 110 East Main Street, State Center, Iowa, hereby supports the request of Partner Communications Cooperative (Partner) that the Federal Communications Commission (FCC or Commission) not enforce certain provisions of its Universal Service support rules in order to allow Partner to receive full Universal Service Fund (USF) support in four exchanges in Iowa that Partner acquired in 2006. Specifically, Partner requests that the FCC forbear from enforcing two sections of its Rules so that Partner may receive full high-cost loop support and local switching support in the Baxter, Melbourne, Rhodes, and State Center exchanges. These exchanges serve the rural communities of Baxter, Melbourne, Rhodes, and State Center, Iowa. SCDA supports Partner's request because it will significantly benefit these rural communities by allowing Partner to continue upgrading its network to provide the platform for, and to accelerate the deployment of, broadband coverage throughout the exchanges.

State Center Development Association is comprised of community volunteers who work in conjunction with the the City of State Center, to attract future growth of business, industry, and housing development to the State Center area. SCDA is one of only twenty four rural communities affiliated with the Iowa Dept. of Economic Development's "Main Street Iowa" Program and has brought over five million dollars in private investment to our Main Street district. The City has funded new streetlights, sidewalks, and street pavement on Main Street. It has sponsored a housing development and has provided major funding for the construction of a new grocery store. Partner Communications Cooperative has participated at various levels in many of these projects. Installation of broadband fiber to the home facilities, by Partner Communications Cooperative, throughout the State Center community meets one of SCDA's goals of 100 percent access to broadband services. Broadband access will stimulate growth in business, industry, and housing in the State Center area creating positive economic growth in our community.

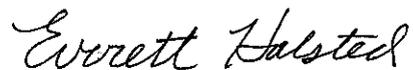
The improvement of the network with the deployment of fiber-to-the-home facilities in the State Center exchange is critical to the health and prosperity of our rural community. Indeed the President, Congress, and the FCC have acknowledged the importance of deploying broadband services throughout America, including to rural areas.¹ Partner's request is consistent with the current government efforts to ensure that rural communities have access to quality telecommunications services, particularly broadband services.

¹ See *in re A National Broadband Plan for Our Future*, GN Docket No. 09-51, Notice of Inquiry, FCC 09-31 (April 8, 2009).

The four exchanges for which Partner seeks relief were historically served by GTE and Iowa Telecom. It is our understanding that the FCC rule in question would prevent Partner from receiving full USF support merely because the company from which Partner acquired the exchanges did not receive USF support. Enforcement of the FCC's high-cost rules in this case, therefore, would penalize rural consumers in the four acquired exchanges merely because they were originally served by a company other than Partner.

Forbearance in this case will benefit consumers and serve the public interest. Accordingly, SCDA supports the grant of Partner's petition. Should you have any questions regarding this matter, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Everett Halsted".

Everett Halsted
Director
State Center Development Association