



November 19, 2010

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

***Ex Parte Notice***

***A National Broadband Plan for Our Future, GN Docket No. 09-51***

***Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licenses, MB Docket No. 10-56***

***Comment Sought on Petition for Rulemaking to Amend the Commission's Rules Governing Retransmission Consent, MB Docket No. 10-71***

Dear Ms. Dortch:

On Thursday, November 18, 2010, David Herron, Chief Executive Officer and General Manager of West Carolina Rural Telephone Cooperative (“WestCarolinaTel”), Shannon Butler, External Affairs/Governmental Relations Manager of WestCarolinaTel, Steve Fravel, Manager-Video Services of the National Telecommunications Cooperative Association (“NTCA”), and the undersigned met with Commissioner Michael Copps, Joshua Cinelli, and Margaret McCarthy to discuss WestCarolinaTel’s operations and serving area and its concerns with respect to certain broadband and video-related regulatory issues.

WestCarolinaTel discussed the nature and reach of the robust network it has deployed in rural South Carolina. WestCarolinaTel explained that its efforts at network deployment have been aimed at installing a network that is capable of delivering high-quality services for its consumers today and in the future. This carefully planned network deployment has allowed WestCarolinaTel to offer high-speed Internet access services that are already in significant demand by consumers, and it has also enabled WestCarolinaTel to stand ready to accommodate greater speeds over time at lower cost and with much less effort as demand increases consistent with the expectations of the National Broadband Plan.

WestCarolinaTel also discussed how video services have helped to promote adoption of its broadband services, leading to a dramatic increase in the “take rate” of higher-speed services (e.g., between 6 Mbps downstream and up to 10 Mbps downstream) by consumers in less than two years. WestCarolinaTel explained, however, that the terms and conditions under which it

Ms. Marlene H. Dortch  
November 19, 2010  
Page Two

obtains broadcast and other programming content negatively affect the provision of such video services. In particular, tying and bundling arrangements between broadcast content and other video or even online content impose substantial costs on WestCarolinaTel's video operations and limit its ability to manage its channel line-up. To address such concerns, particularly as they relate to and could be exacerbated by the pending Comcast-NBCU merger, WestCarolinaTel urged that the Commission at the very least impose conditions on the merger consistent with those recommended in prior filings in MB Docket No. 10-56 by NTCA and the American Cable Association, and also that the Commission amend its retransmission consent rules consistent with the recommendations of NTCA and other associations in prior filings in MB Docket No. 10-71.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. Copies of the materials distributed at the meeting are enclosed with this letter. If you have any questions, please do not hesitate to contact me at (703) 351-2016 or [mromano@ntca.org](mailto:mromano@ntca.org).

Sincerely,

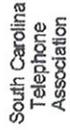
/s/ Michael R. Romano  
Michael R. Romano  
Senior Vice President - Policy

MRR:rhb

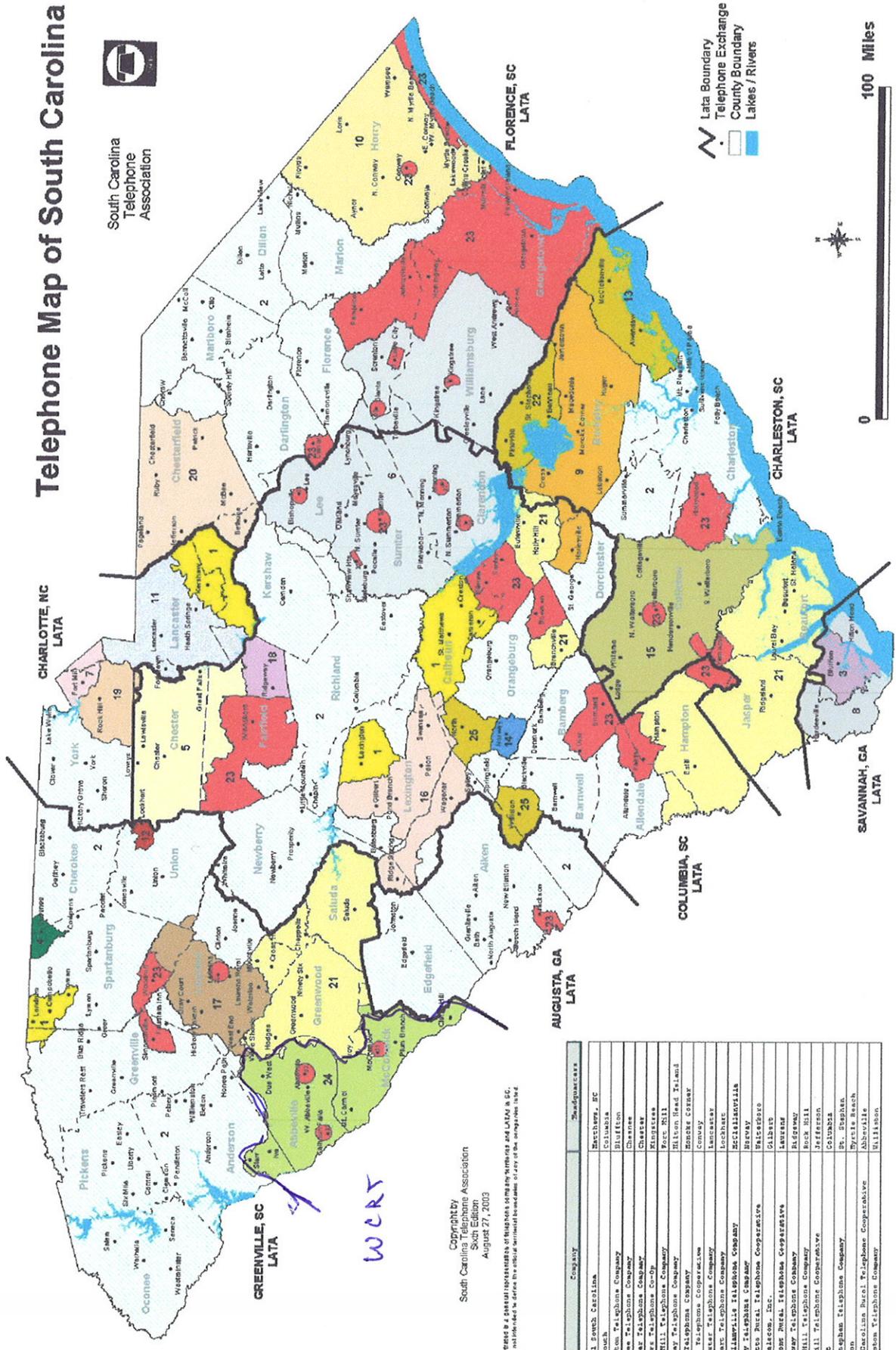
Enclosures

cc: Commissioner Michael J. Copps  
Joshua Cinelli  
Margaret McCarthy

# Telephone Map of South Carolina



South Carolina Telephone Association



LATA Boundary  
 Telephone Exchange  
 County Boundary  
 Lakes / Rivers



0 100 Miles

Copyright © South Carolina Telephone Association  
August 27, 2003

REFERRED TO 4 SPECIAL REPRESENTATIVES OF BUSINESS MEMBERS, WRITING AND LATA IN SC.  
It is not intended to derive the official territorial boundaries of any of the companies listed.

Area	Company	Subdivisions
1	AT&T	Greenville, SC
2	AT&T	Charleston, SC
3	AT&T	Columbia, SC
4	AT&T	Greenville, SC
5	AT&T	Greenville, SC
6	AT&T	Greenville, SC
7	AT&T	Greenville, SC
8	AT&T	Greenville, SC
9	AT&T	Greenville, SC
10	AT&T	Greenville, SC
11	AT&T	Greenville, SC
12	AT&T	Greenville, SC
13	AT&T	Greenville, SC
14	AT&T	Greenville, SC
15	AT&T	Greenville, SC
16	AT&T	Greenville, SC
17	AT&T	Greenville, SC
18	AT&T	Greenville, SC
19	AT&T	Greenville, SC
20	AT&T	Greenville, SC
21	AT&T	Greenville, SC
22	AT&T	Greenville, SC
23	AT&T	Greenville, SC
24	AT&T	Greenville, SC
25	AT&T	Greenville, SC
26	AT&T	Greenville, SC
27	AT&T	Greenville, SC
28	AT&T	Greenville, SC
29	AT&T	Greenville, SC
30	AT&T	Greenville, SC
31	AT&T	Greenville, SC
32	AT&T	Greenville, SC
33	AT&T	Greenville, SC
34	AT&T	Greenville, SC
35	AT&T	Greenville, SC

WERT



**We're Kicking Off  
West Carolina  
Wireless With a  
3-Month Free Offer!**

Sign up for West Carolina Wireless in October and we'll give you the first three months of your chosen wireless voice package **FREE!**

We have a great selection of phones and packages that are perfect for families, individuals and businesses.

Come in to our Abbeville office and check it out!

**West Carolina Wireless**  
www.wctelephone.com / www.wctel.net

\* Two year contract required. Offer does not include texting packages or other non-voice features.

**Watch Your Mail for Your Capital Credit Check  
The Cooperative Difference Results In Giving Back**



We have sent \$1,500,000 in capital credit checks to our customers. The more services you have with us, the more your capital credit check. It's a reward for supporting your local cooperative. Thank you for your loyalty.

**MUSIC CHOICE  
IS BACK!**

Due to popular demand, we've brought the line up of Music Choice channels to our DE Plus line up. For a specific listing of the Music Choice channels, go to [www.wctel.net](http://www.wctel.net) and click on West Carolina News.



**West Carolina Tel**  
YOUR COMMUNICATIONS  
COOPERATIVE

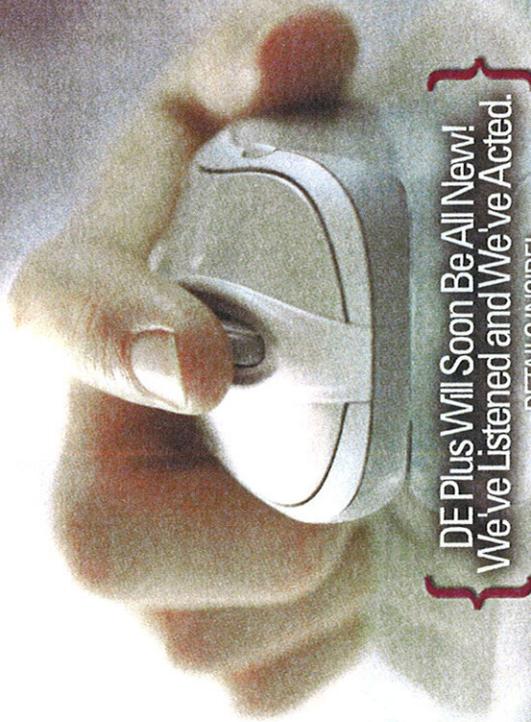
Abbeville: 233 Hwy 28 Bypass / Abbeville, SC 29620 / (864) 446-2111  
McCormick: 200 Virginia Street / McCormick, SC 29635 / (864) 852-5000  
Iva: 619 West Front Street / Iva, SC 29655 / (864) 348-6111  
Repair Service: (864) 446-3111

[www.wctelephone.com](http://www.wctelephone.com) / [www.wctel.net](http://www.wctel.net)

CHOOSE  
LOCAL  
SAVE

[www.wctel.net](http://www.wctel.net)  
CUSTOMER NEWS / OCTOBER 2010

**FREE & AUTOMATIC  
UPGRADE  
OF YOUR INTERNET SPEED**



**DE Plus Will Soon Be All New!**  
We've Listened and We've Acted.

DETAILS INSIDE!

**West Carolina Tel**  
YOUR COMMUNICATIONS  
COOPERATIVE

**FREE HDTV  
WITH OUR NEW  
IPTV**

JUST IN  
TIME FOR  
SPORTS!

CONNECT RIGHT HERE.

# Faster Speeds With Lower Prices.

**It's Automatic Plus Get the First Month FREE!**

Almost every West Carolina High Speed Internet customer will see either a speed increase or a price decrease this month reflected on their October 1 bill. You can see your new speed increase/price decrease in the enclosed bill.

**Save even more -- up to 15% if you subscribe to other services.**



**On Line**

**Your Automatic New Speeds**  
(as of October 1, 2010)

Up to 1.5 MB	\$24.65
6 MB	\$31.62
10 MB	\$42.17

**Now's the perfect time to increase your speed!**

**CHOOSE LOCAL SAVE**

CUSTOMER NEWS / OCTOBER 2010  
CONNECT RIGHT HERE.

Members who currently subscribe to our discontinued Digital Entertainment service will not see a speed increase. Now, get DE Plus to get higher speeds and lower prices. Prices are monthly and reflect a 5% Choose Local Save Local Discount.

**Sign Up For WCT High Speed Internet  
In October and Get the First  
Month of Service FREE!**

If you haven't yet tried our High Speed Internet service, now is the time. Great speeds, great service and a FREE Month!

## New Software Is Solution To DE Plus Concerns: Our Goal Is, "No More Customer Frustration!"

The new DE Plus day has come! IPTV is amazing new TV technology, and we have been one of the first initiators to bring it to customers. We have worked around the clock to take care of customer problems that have mostly been caused from getting suppliers to fulfill their agreements to our demands.

This technology is as new to the market as phones were in the very beginning! So much has to be built and put together. We understand your demand for digital entertainment, and we know how

to get it to you. And we now have the equipment that can make it happen.

We are deeply grateful to our customers for working with us throughout this ordeal. Together we have all been touching this very new technology, and together we believe it will become a local success story worth the effort of perfection.

Thank you for staying interested and letting us work out the problems. We'll always remember this trust. We expect the new installations of software to be in place by the end of the year.

- Instant channel change • Caller ID and call log on your TV
- Expanded search capability • Voice Mail indicator on your TV
- Whole Home DVR (schedule recordings from any TV in any room or from a PC or cell phone and view recorded programming on any TV)
- In Demand's pay-per-view with 6 standard definition channels and one high definition channel.
- Rewind TV, which allows you to select certain pre-determined channels and go back in time for up to one hour and replay the programming (without a DVR)

**OUR UPDATED  
DE PLUS WILL  
GIVE YOU ALL  
OF THIS.**

## HIGH DEF (HD) IS NOW FREE!

High Definition TV truly shows off our new IPTV product with the most vivid, real life picture and sound available. And now, it's FREE with our DE Plus Bronze and Silver packages. If you currently subscribe to our High Definition channels, you will automatically see a line item for HD with a \$0 amount on your bill. If you want to add free HD to your DE Plus service, call us today! FREE HD is only available to our DE Plus customers, so if you don't yet have DE Plus, now's the time to subscribe.

**Also, sign up for DE Plus in October and get the first month FREE!**