NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION
The Voice of Rural Telecommunications
www.ntca.org

June 16, 2011

***Ex Parte* Notice**

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

***Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Developing* a *Unified Intercarrier Compensation Regime*, CC Docket 01-92; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link-Up*, WC Docket No. 03-109**

Dear Ms. Dortch:

On Wednesday, June 15, 2011, Scott Hoffman of Wisconsin Independent Network, LLC (WIN) and the undersigned (collectively, NTCA) met with Angela Kronenberg of Commissioner Mignon Clyburn's office. The attached presentation and map served as the basis for discussion.

The purpose of these meetings was to help explore what conditions may (or may not) be conductive to the combination of resources by and among carriers. Accordingly, NTCA first described WIN members' collaborative efforts that leverage network assets, intellectual capital, and common business interests. As demonstrated in the attached presentation, the rural local exchange carrier (RLEC) members of WIN have created a 3,000 mile fiber ring that touches 80 locations in four states. And, as indicated in the attached presentation, WIN members have realized efficiencies through, *inter alia*, the operation of shared video head ends and the WIN network to obtain lowest cost long distance transport for member customers. NTCA also described the cooperative effort of WIN members to provide low cost Internet bandwidth through Airstream Communications, a sister company to WIN, enabling member companies to increase bandwidth without increasing prices.

In addition to describing instances in which the RLECs obtained efficiencies through combination or sharing of resources, NTCA described instances in which where efficiencies were perceived initially, but rejected once further examination revealed shortfalls or inefficiencies. In sum, the discussion developed the proposition that RLECs are aggressively developing collaborative efforts that will yield beneficial efficiencies where those opportunities exist, but that such opportunities may not exist in all instances.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (703) 351-2035 or jseidemann@ntca.org.

Respectfully submitted,

/s/ Joshua Seidemann
Joshua Seidemann
Director of Policy

JS:rhb

Attachments

cc: Angela Kronenberg

SHARED EFFICIENCIES

Resource Sharing and Collaborative Efforts Among Rural Carriers

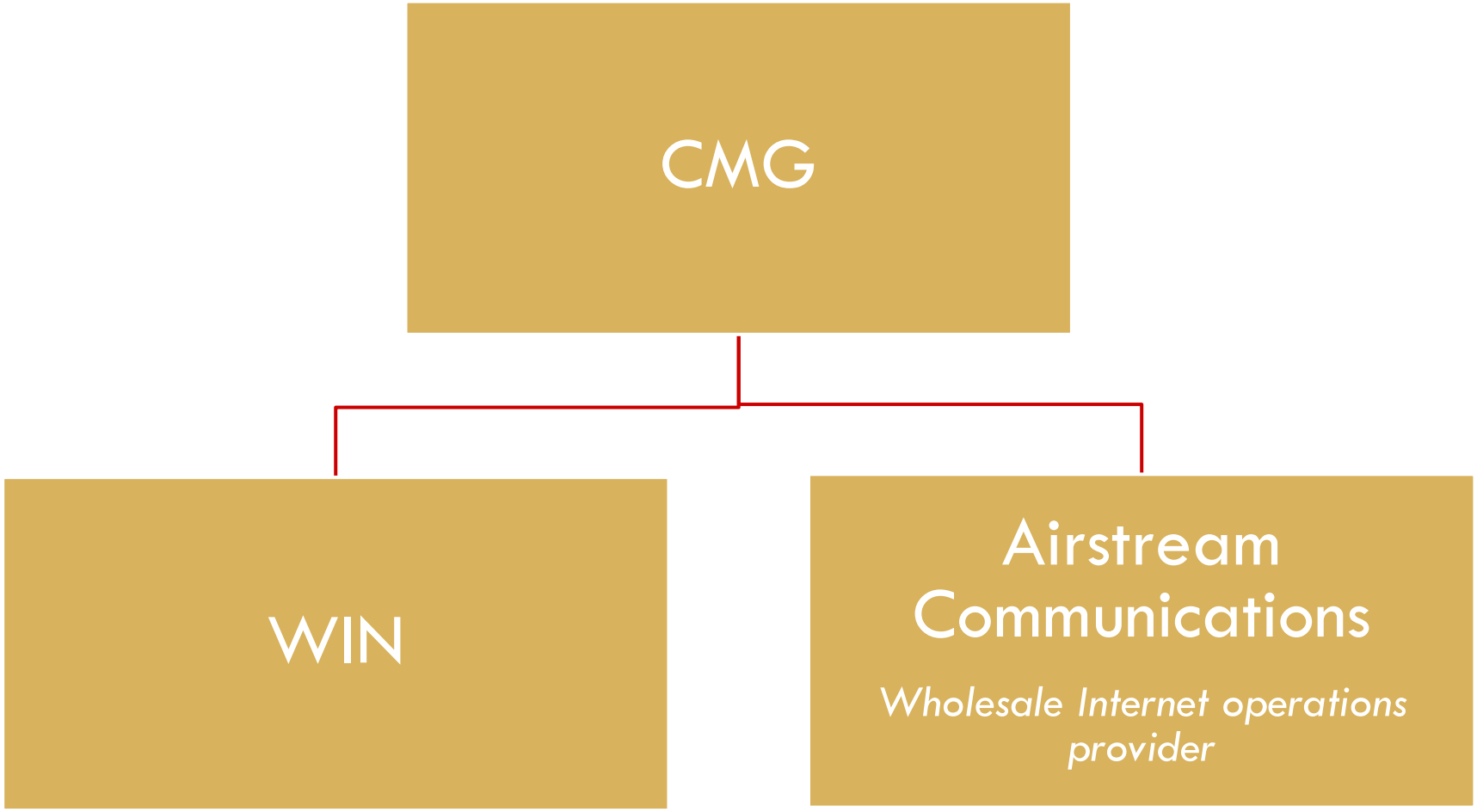
WIN

- Wisconsin Independent Network
- Formed in 1997 by seven independent LECs in northwestern Wisconsin
- Deploy fiber network to obtain toll diversity for customers
  - Affirmed ability to reach 911 regional PSAPs, long-distance calls
- Leverage network to make bandwidth commercially available for other carriers and businesses

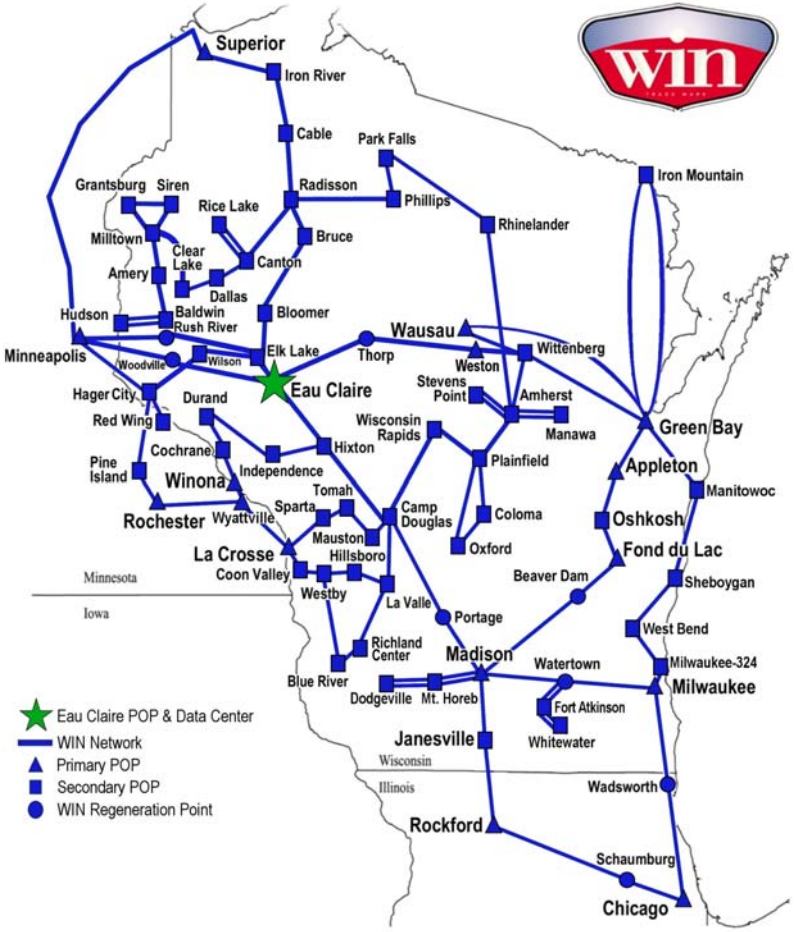
WIN

- Initial 325-mile folded OC-48 SONET fiber ring now 3,000 miles
- Touches 80 locations in WI, IL, MN, and MI
- Provides high-speed bandwidth to member companies, large telecom providers, and enterprise businesses
  - RLECs able to migrate from dial-up to DSL to higher capacity bandwidth at lower rates
- Board composed of member companies
- Currently 31 ILECs are members of parent company

WIN


CMG
WIN
Airstream Communications
Wholesale Internet operations provider

WIN


Superior
Iron River
Cable
Park Falls
Iron Mountain
Grantsburg
Siren
Radisson
Phillips
Rice Lake
Rhinelander
Milltown
Bruce
Clear Lake
Canton
Amery
Dallas
Hudson
Baldwin
Bloomer
Rush River
Wausau
Minneapolis
Wittenberg
Woodville
Wilson
Elk Lake
Thorp
Weston
Eau Claire
Stevens Point
Amherst
Hager City
Durand
Red Wing
Wisconsin Rapids
Manawa
Green Bay
Cochrane
Hixton
Plainfield
Pine Island
Independence
Appleton
Winona
Manitowoc
Tomah
Sparta
Camp Douglas
Coloma
Oshkosh
Rochester
Wyattville
Mauston
Oxford
Fond du Lac
La Crosse
Hillsboro
Coon Valley
Beaver Dam
Sheboygan
Minnesota
Westby
La Valle
Iowa
Portage
West Bend
Richland Center
Madison
Watertown
Milwaukee-324
Blue River
Milwaukee
Dodgeville
Mt. Horeb
Fort Atkinson
Eau Claire POP & Data Center
WIN Network
Primary POP
Secondary POP
WIN Regeneration Point
Janesville
Whitewater
Wisconsin
Illinois
Wadsworth
Rockford
Schaumburg
Chicago

WIN efficiencies

- Shared Video Head End and use of the WIN network for Video transport from Head End to telephone companies
- Network Monitoring through WIN Network Management Center
- Sharing of spare parts
- Transport of Long Distance to and from Chicago using WIN network to obtain lowest cost long distance for member telco customers
- Ethernet WAN connectivity to rural Wisconsin customers

WIN efficiencies (con't)

- BadgerNet – State of Wisconsin Department of Administration – coalition of all local telephone companies in Wisconsin providing low cost IP based Internet and Voice Services
- Use of WIN network to deliver services to over 160 state and education sites in rural Wisconsin
  - WIN supports RLECs partnered through BadgerNet
- Shared SAN platform to wholesale to telco end users for digital storage services in the "cloud

Independent Telco Investors in WIN

- Amery Tel
- Amherst Tel
- Baldwin Tel
- Bruce Tel
- Bloomer Tel
- Chequamegon Tel
- Citizens Tel
- Clear Lake Tel
- Cochrane Tel
- Coon Valley Farmers Tel
- Chibardun Tel
- Farmers Independent Tel
- Hager Tel
- Hillsboro Tel
- Indianhead Tel
- La Valle Tel
- Lemonweir Valley Tel
- Luck Tel
- Manawa Tel
- Marquette-Adams Tel
- Nelson Tel
- Price County Tel
- Richland Grant Tel
- Siren Tel
- Spring Valley Tel
- Tri-County Tel
- Union Tel
- Vernon Tel
- West Wisconsin Tel
- Wittenberg Tel
- Wood County Tel

Airstream efficiencies

- A cooperative effort amongst Wisconsin telcos to pool resources to enable delivery of low cost, high availability Internet bandwidth services to local telephone company end users.
- One set of infrastructure to support all telco Internet needs
- Central administration through Airstream support staff

Airstream efficiencies (con't)

- Use of WIN network to deliver Internet bandwidth to telco central offices
  - Dual serving centers
  - Dual drains to Minneapolis and Chicago for diversity
  - Enabling the tripling of bandwidth to customers in past six months (primarily due to Netflix) without increased costs to telephone company customers. This is primarily due to the bandwidth capacity of the WIN network across Wisconsin.
  - Shared email and spam filtering platform

Efficiency factors

- Identification of opportunities for collaborative efforts
- Analysis of costs, anticipated benefits
  - First impressions, studied investigations
- Collaborative efforts: shared tangible and intellectual resources

Contact

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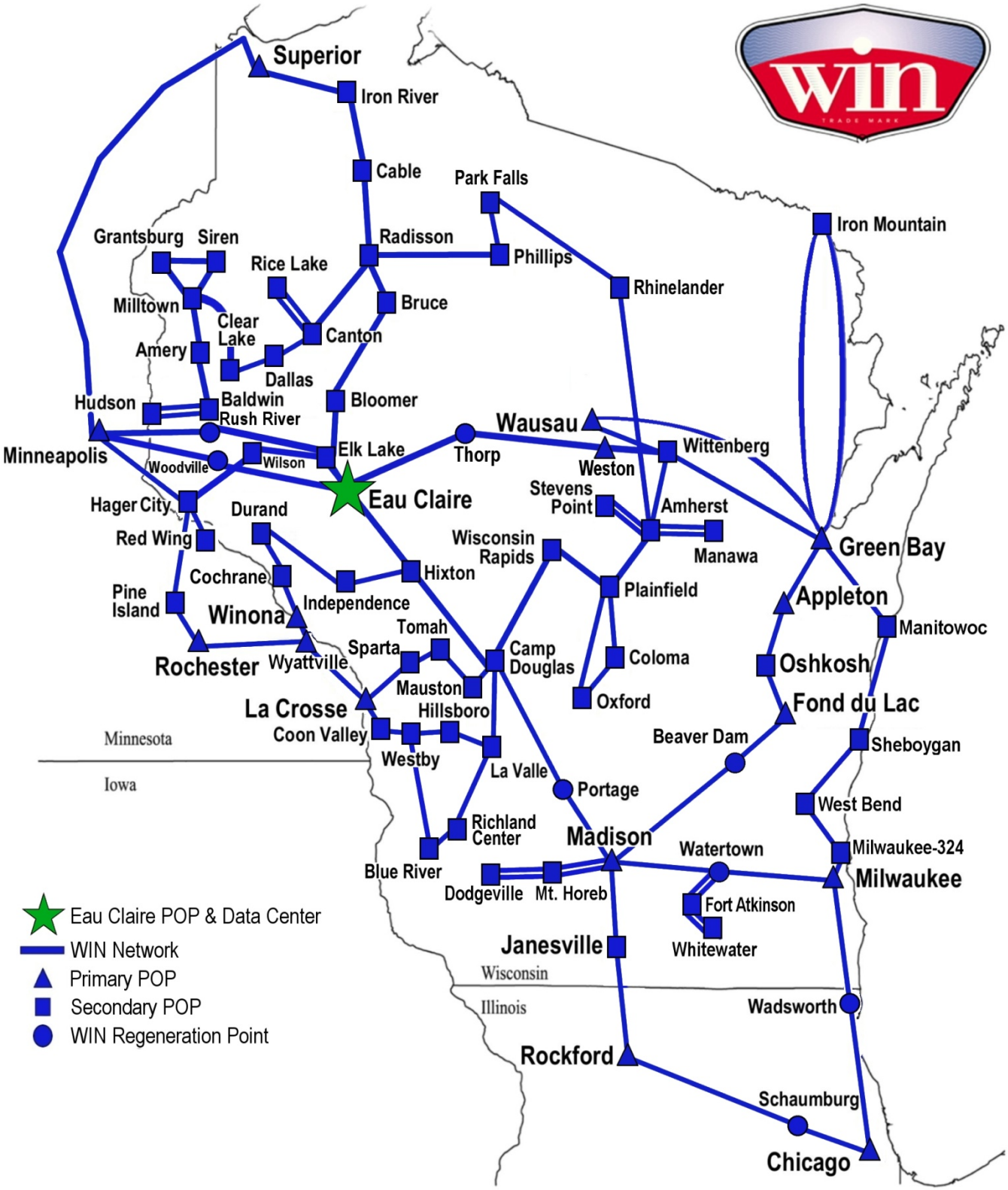
Wisconsin Independent Network
Fiber Optic Network