

ORIGINAL



REDACTED – FOR PUBLIC INSPECTION

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June 24, 2011

FILED/ACCEPTED

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

EX PARTE OR LATE FILED

JUN 24 2011

Federal Communications Commission
Office of the Secretary

Re: WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109 BEK Communications Cooperative, Inc. Notice of Ex Parte Presentation

Dear Ms. Dortch:

This request for confidentiality is made on behalf of BEK Communications Cooperative (“BEK”) pursuant to the September 16, 2010 Protective Order in CC Docket No. 01-92, WC Docket Nos. 05-337, 07-135 and 10-90 and GN Docket No. 09-51.¹ BEK seeks confidential treatment of the data attached to the above-referenced Notice of Ex Parte Presentation.

Pursuant to paragraph 4 of the Protective Order, non-redacted and redacted versions are filed herewith. Each page of the non-redacted submission is marked “CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135 AND 10-90 AND GN DOCKET NO. 09-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION”. Each page of the redacted submission is marked “REDACTED - FOR PUBLIC INSPECTION”. The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System.

Please contact the undersigned with any questions.

Respectfully submitted,

/s/ John Kuykendall

John Kuykendall
Vice President
on behalf of
BEK Communications Cooperative

Attachment

cc: Lynne Hewitt Engledow, Wireline Competition Bureau (two copies non-redacted)

¹ See *Developing a Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92, Protective Order, 25 FCC Rcd 13160 (WCB 2010)

No. of Copies rec'd 0+1
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1380 Corporate Center Curve
Eagan, Minnesota 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Building B-3, Suite 200
Atlanta, Georgia 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, Utah 84010
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Federal Communications Commission
Office of the Secretary

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

**Re: WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109
Notice of Ex Parte Presentation**

Dear Ms. Dortch:

On June 22, 2011, Derrick Bulawa of BEK Communications Cooperative (“BEK” or “Cooperative”), John Kuykendall and Valerie Wimer of John Staurulakis, Inc. (“JSI”) met separately with Angela Kronenberg, Wireline Legal Advisor to Commissioner Mignon Clyburn, and with Kevin King and James Bachtell of the Wireline Competition Bureau. The subject of discussion was the impact of proposed National Broadband Plan universal service reforms on communications services in rural North Dakota. Attached is a copy of the presentation material provided.

Mr. Bulawa described the operations of BEK, the largest private employer in its service territory, highlighting the reliable communications services provided in over six rural counties that cover an expanse of land approximately the size of Connecticut and Rhode Island combined. BEK’s wireline telephone and broadband service provides stable and reliable service in sparsely populated rural areas that average 1.1 lines per square mile territory wide with the rural farmstead density of .43 lines per square mile, noting that 40% of their members live on working farmsteads. Mr. Bulawa explained that the Cooperative’s members depend on BEK broadband services for dependable connections that are critical to emergency, medical, law enforcement, local government and education services, as well as work-at-home employment. Twenty-two and a half percent of BEK’s broadband subscribers derive a second income in the farmstead via the Internet.

Mr. Bulawa discussed the impact of reforms proposed in the Commission’s NPRM¹ including the impact that the reforms would likely have on the Cooperative’s loan commitments. In order for BEK to remain financially viable, continue to honor its carrier of last resort obligations and to provide the services that are essential to its members, Mr. Bulawa urged the Commission to cap rather than eliminate corporate operations costs, to preserve local switching and safety net additive support, and to continue support of rural rate of return operations and capital investment. In addition, Mr. Bulawa expressed the need for all network users to compensate carriers for use of the network, and for a process to turn off carriers that don’t pay access or misclassify jurisdictions.

¹ *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, and Lifeline and Link-Up*, WC Dockets No. 10-90 et al., FCC 11-13 (rel. Feb. 9, 2011); 76 Fed. Reg. 11632-11663 (2011) (“NPRM”).

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June 24, 2011
Page 2

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Mr. Bulawa concluded by stating that both broadband and carrier of last resort telephone service must be supported.

Please contact the undersigned with any questions.

Respectfully submitted,

/s/ John Kuykendall
John Kuykendall
Vice President
on behalf of
BEK Communications Cooperative

cc: Angela Kronenberg
Kevin King
James Bachtell

Attachment

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The logo for BEK Communications, featuring the letters "BEK" in a bold, red, italicized sans-serif font. The letters are centered within a white circle that has a blue outline. This circle is positioned in the middle of a horizontal light blue bar that spans across the width of the slide.

BEK

Why Are Communications Services So Important in the Rural Landscape?

Presented By:

Derrick Bulawa, GM/CEO

BEK Communications Cooperative - Steele, ND

June 22, 2011

BEK Communications

BEK

BEK Communications Cooperative

- Formed in 1952 (59 years old)
 - Established by farmers because no one else would provide service
- Headquarters in Steele, North Dakota
- Serving 6+ rural counties, over 5,585 Sq. Mi.
- 18,500 population
- 6,248 lines served; 1.1 lines per Sq. Mi.
- 3,890 miles of line; 1.61 access line per line mile
 - 2,473 miles fiber
 - 1,417 miles copper
- 5,394 members; .95 avg. member density per Sq. Mi.
- 2126 rural members; .38 rural member density per rural Sq. Mi.
- COLR obligation fulfilled
 - **Section 49-21-01.8 ND Century Code**
 - Requires ubiquitous POTS and Directory services.
- No terrestrial competition
- Mobile coverage is limited to major roads and towns **ONLY**.

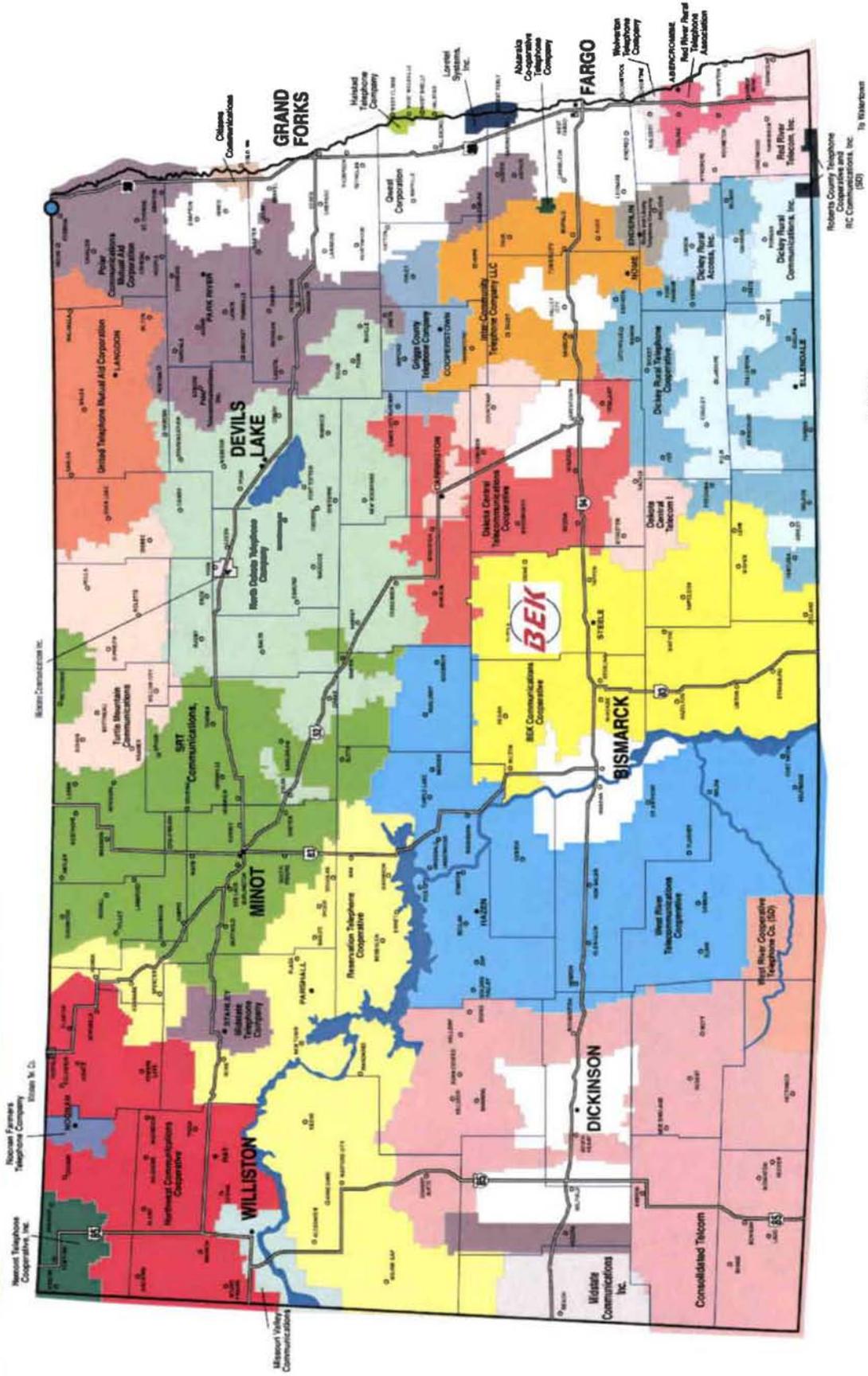


BEK Employee with her
Daughter at
Robinson, ND Parade.

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Statewide Map of ILECS



To Mapleton

Roberts County Telephone
RC Communications, Inc.
(800) To Minot

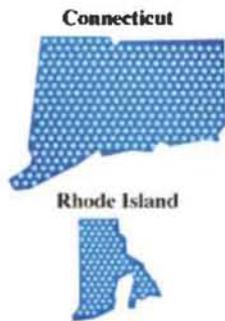




Population Density and NJ Comparison

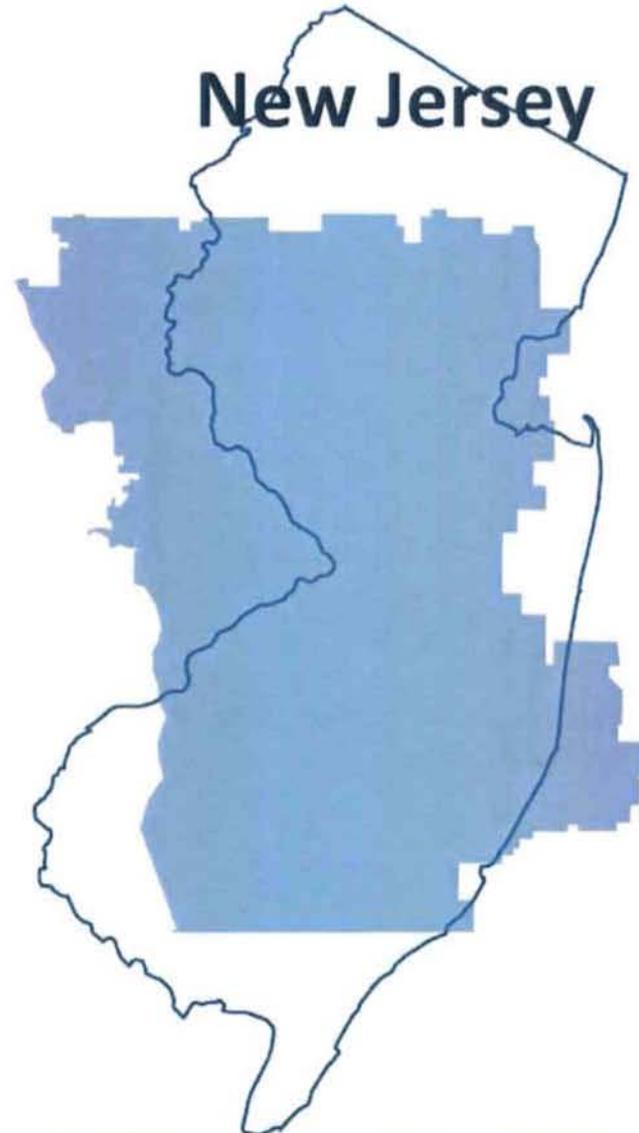


○ = 10,000 people



Connecticut + Rhode Island COMBINED have a similar size land area as BEK, but 4.25 million more people to share the cost.

	<i>Square Miles</i>	<i>Population</i>
BEK Service Area	5,585	20,000
Rhode Island	1,045	990,800
Connecticut	4,845	3,282,031



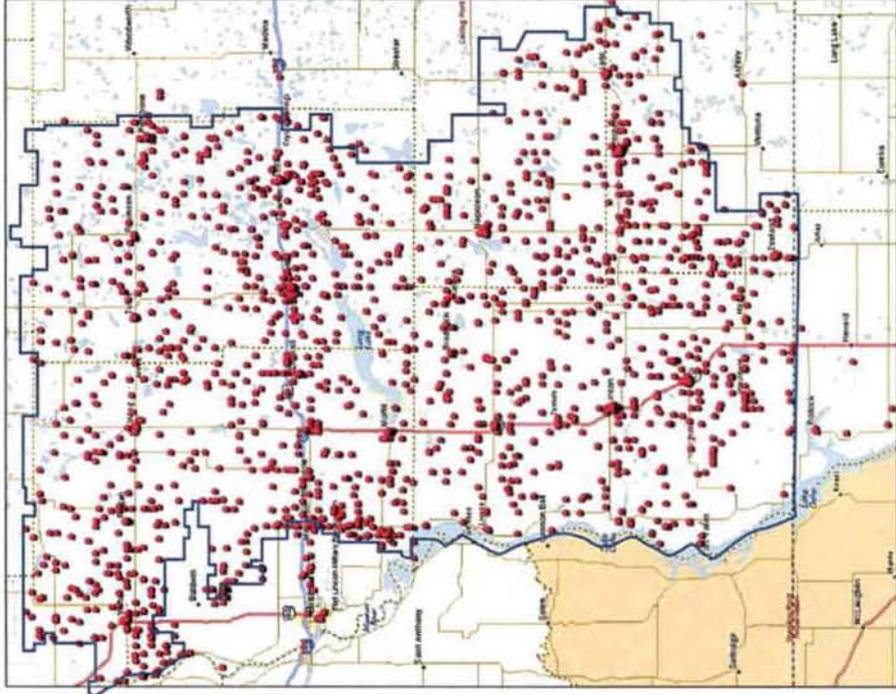
REDACTED - FOR PUBLIC INSPECTION



Membership Map

BEK Membership Distribution

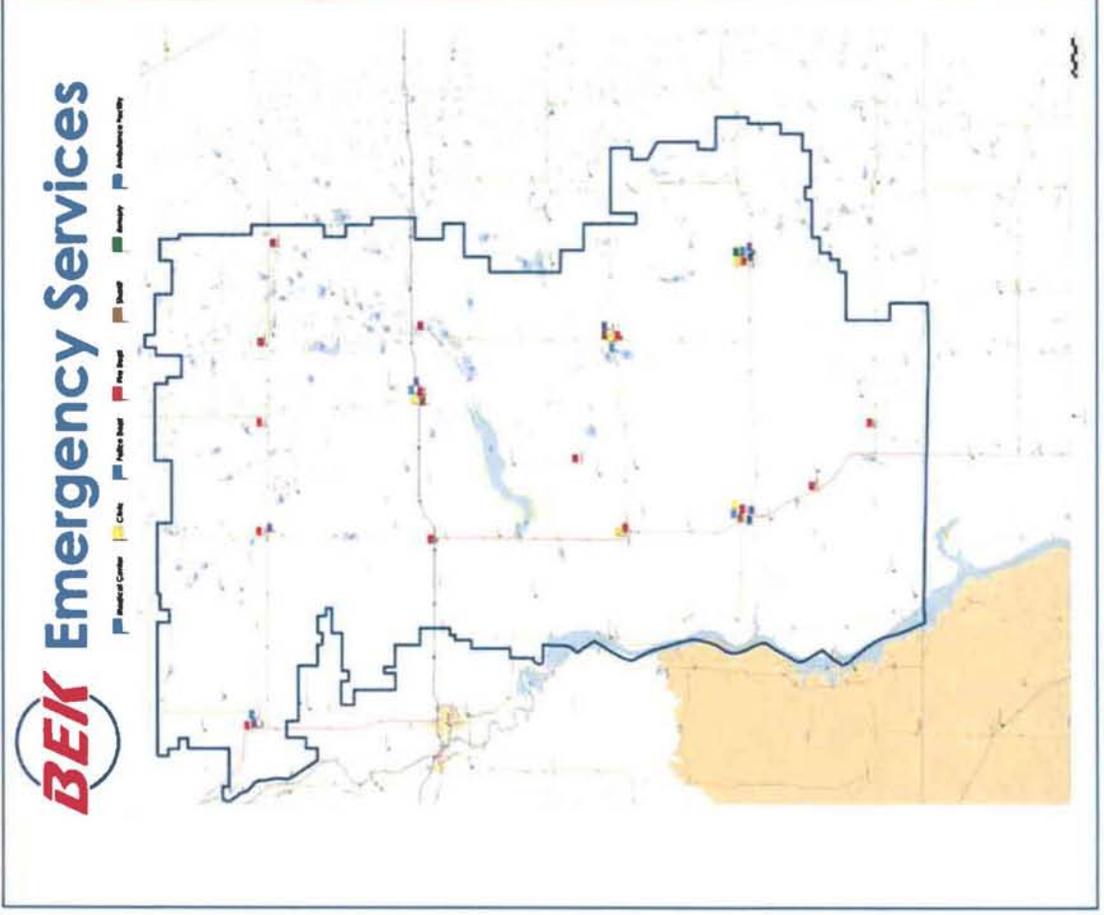
 BEK Member



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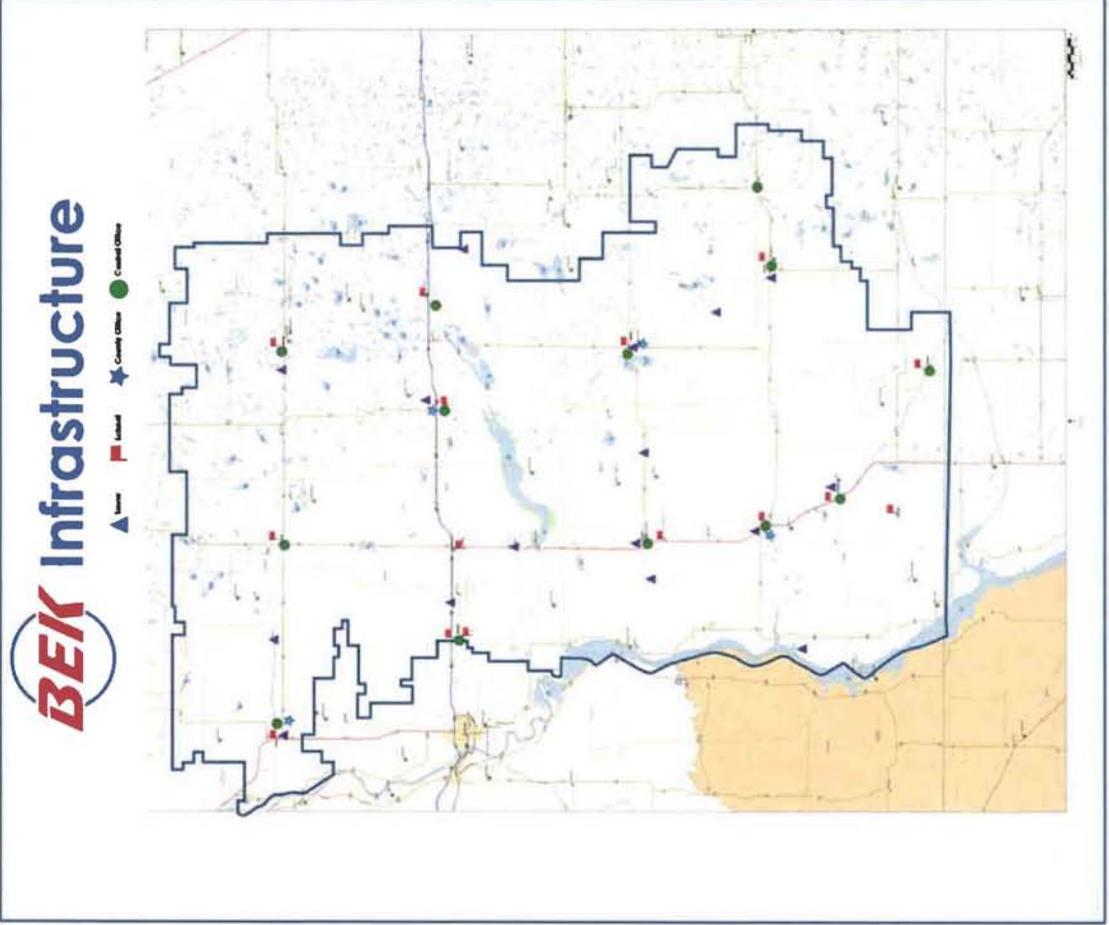


Emergency Services Map



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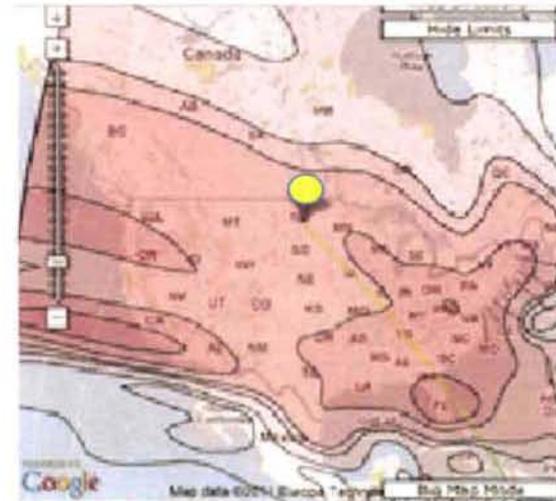
BEK Infrastructure Map





Work and Education Quality Internet

- Wireless & satellite broadband do not effectively support work from home or online education:
 - Limited throughput
 - Unstable secure VPNs
 - No QOS
 - Unreliable for real-time services
 - Voice, video chat, real-time service
 - Performs poorly with distance and weather



- Satellite in North Dakota
 - Edge of coverage – low look angle (19-30 degrees elevation) - atmosphere

- Terrestrial wireless in North Dakota
 - Spotty coverage – long distances – terrestrial obstructions



- **22.5% of our broadband subscriber derive a second income in the Farmstead via the Internet.**



BEK Economic Data

- Consolidated revenues \$ [Redacted]
- Regulated revenues \$ [Redacted]
- RUS debt \$ [Redacted]
- Interest payments \$ [Redacted]
- Principle payments \$ [Redacted]
- Support per line including ICC \$ [Redacted]
- Employees [Redacted]
- CND economic impact \$ [Redacted]

- **The largest private employer in service area**

BEK

Service Rate Samples



BEK Employee Teaching
Internet Class in
Napoleon, ND

- POTS \$ 28.45
(Line \$17.98, - 911, SLC, TRS, FUSC & Tax)
- Broadband \$ 46.75
(Up to 12 Mbps - taxes +4.95 modem)
- TV service \$ 67.51

(186 Channels - taxes & Franchise fee)

BEK

SAC ID: 381604

NPRM Proposed Changes

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High Cost Loop Fund Changes:

Current HCL Support*

Reduction due to algorithm change
 Reduction due to elimination of Corp. Exp.
 Combined effect (run together)
 Increase due to resizing of NACPL
 Revised HCLF Support

(stand alone) **Redacted**
 (stand alone) **Redacted**

 (assumed NACPL reduction of 26.86%)

Redacted

Redacted
Redacted

FCC proposes to eliminate (or reduce) support for corporate expenses in all funding mechanisms.

FCC proposes to reduce the reimbursement percentages for high-cost loop support from the current percentages of 65% for qualifying study area loop costs between 115 - 150% and 75% for qualifying study area loop costs in excess of 150% to 55% and 65%, respectively.

Local Switching Support Changes:

Current LSS

Reduction due to elimination of Corp. Exp.
 Revised LSS Support

Redacted
Redacted
Redacted

The FCC seeks to eliminate local switching support, or combine this program with high-cost loop support. Alternatively, the FCC would combine the LSS program into the HCLS program—creating a LHCS hybrid, using an algorithm similar to HCLS.

Interstate Common Line Support Changes:

Current ICLS

Reduction due to elimination of Corp. Exp.
 Revised ICLS Support

Redacted
Redacted
Redacted

The FCC seeks to eliminate safety net additive support immediately, or implement a phase-down over possibly three years.

Safety Net Additive

Current Safety Net Support

Reduction due to elimination of Safety Net
 Revised Safety Net

Redacted
Redacted
Redacted

	Original	Revised	Impact	% Change
HCLF	Redacted	Redacted	Redacted	Redacted
LSS	Redacted	Redacted	Redacted	Redacted
ICLS	Redacted	Redacted	Redacted	Redacted
Safety Net	Redacted	Redacted	Redacted	Redacted
Totals	Redacted	Redacted	Redacted	Redacted
Loops	Redacted	Redacted	Redacted	Redacted
USF/Loop/Year	Redacted	Redacted	Redacted	Redacted

*2010-1 NACPL of \$458.36



Tier Calculation

Debt Test Analysis - NPRM Scenario

Times Interest Earned Ratio

Net Income
 Interest Expense
 Net Income + Interest Expense
 Times Interest Earned Ratio (TIER)
 Minimum Requirement
 Pass/Fail?

2012	2013	2014	2015
Redacted	Redacted	Redacted	Redacted
Redacted	Redacted	Redacted	Redacted
Redacted	Redacted	Redacted	Redacted
Redacted	Redacted	Redacted	Redacted
Redacted	Redacted	Redacted	Redacted
Fail	Pass	Fail	Fail

Debt Test Analysis - Existing Support Scenario

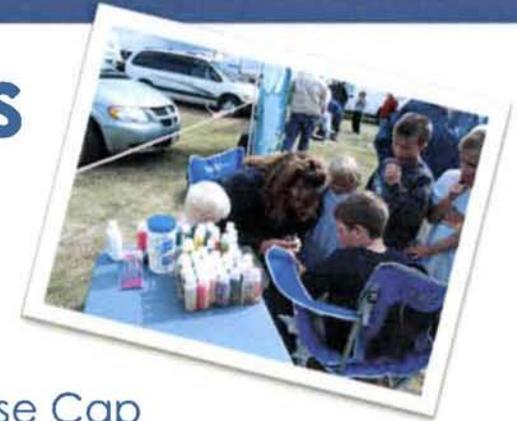
Times Interest Earned Ratio

Net Income
 Interest Expense
 Net Income + Interest Expense
 Times Interest Earned Ratio (TIER)
 Minimum Requirement
 Pass/Fail?

2012	2013	2014	2015
Redacted	Redacted	Redacted	Redacted
Redacted	Redacted	Redacted	Redacted
Redacted	Redacted	Redacted	Redacted
Redacted	Redacted	Redacted	Redacted
Redacted	Redacted	Redacted	Redacted
Pass	Pass	Pass	Pass

BEK

BEK Policy Positions



- Support:
 - Applying the current HCLS Corporate Operation Expense Cap algorithm to the LSS and ICLS programs, not elimination
 - Continuing the LSS program because rural ILECs would have to increase their local switching interstate access rate to recover switching costs if it were eliminated
 - Continuing Safety Net Additive program and remove per-line requirement to address FCC's concerns that the per-line threshold is not adequately targeting significant increases in total investment
 - Ongoing operations support in rural
 - Ongoing capital investment support in rural (ROR)
 - All network users must pay for network use or ICC revenue recovery
 - Provide legal basis to turn off carriers that don't pay access or misclassify jurisdictions
 - Respect and support COLR obligation
 - Must have support for broadband and POTS



Community Impact of High Quality Internet Service

- Encourages rural development
- Improves and reduces cost of local medical service
- Equalized educational opportunity for small rural schools
- Facilitates secondary and post secondary education
- Empowers emergency services with information
- Provides ubiquitous access to criminal justice information for police and sheriffs
- Facilitates modern voting and county court functions
- Work from home opportunities
- Expands business markets



BEK Sponsoring Kids Games at Event in Braddock, ND

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Appendix to Presentation



FTTH is Actually Cheaper in Rural

- Fiber is 1/3 the price of copper.
- Distribution cabinets do NOT reduce deployment costs with a rural density of .38 sub/Sq. Mi.
- FTTH reduces repair costs by over 45%.



Cust Item	BSE Item	Material MFG - Description	Quantity	Price	Per UoM	Value
	000010	2651006 TOUT - BURIED-25PR/22 GOPIC-F PE39 GNRL 7528037	10,000 FT	1,411.28 / 1,000	FT	14,112.80
	000020	2472060 FIBR - 24 F SM SJSA ZWP PUREDR SE 5VE0024-12-A	10,000 FT	324.75 / 1,000	FT	3,247.50

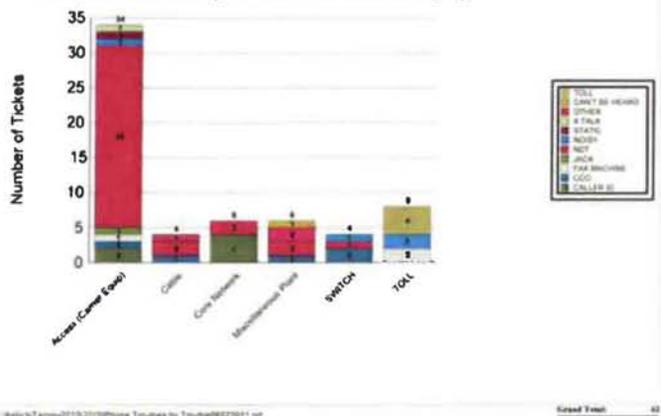
Fiber

1 of 18 Exchanges

Copper

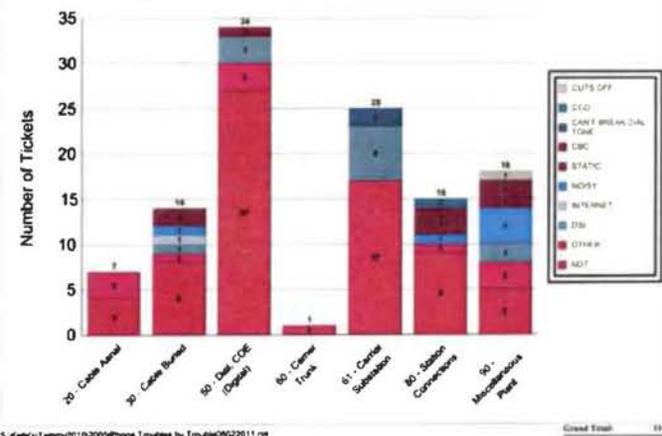
Annual Telephone Trouble Tickets between 1/1/2010 and 12/31/2010

Telephone Tickets by Trouble and Plant Category



Annual Telephone Trouble Tickets between 1/1/2005 and 12/31/2005

Telephone Tickets by Trouble and Plant Category



© Kelly's Terminal 2010 Telephone Troubles by Trouble0022011.rpt

Grand Total 68

© Kelly's Terminal 2005 Telephone Troubles by Trouble0022011.rpt

Grand Total 114



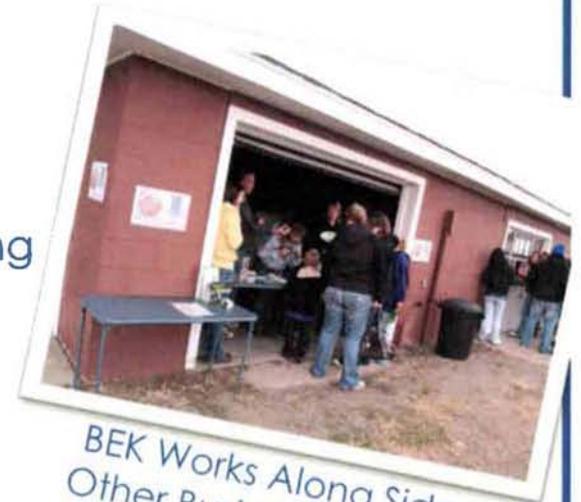
Creating Efficiencies and Scale

- **Dakota Carrier Networks**
 - 16 ILEC owners
 - Internet peering
 - Private circuits
 - Middle mile
 - Caller ID database
 - Statewide transport for mobile wireless
- **North Dakota Long Distance**
 - 10 ILEC owners
 - Volume purchase
 - LD products after US West exited rural
 - Trouble reporting
- **National Information Systems Coop.**
 - 550 ILEC & REC members
 - Data storage & backup
 - Invoice rendering, printing & mailing
 - OSS systems provider
 - CABS rating & call rating
- **National Rural Telecom Coop.**
 - 1,500 ILEC & REC members
 - Wholesale LD
 - Wholesale TV content
 - Utilities technology
 - Resell wireless services
 - TV transport & integration



Creating Efficiencies and Scale

- **Apprentice Training and Safety**
 - 16 ILEC owners
 - Safety training
 - Driving/Equipment safety
 - Technical training
 - Medical assistance training
 - Educational certification
- **Call center outsourcing**
 - Dakota Central Telecom
 - Golden West Telecom
 - SRT Communications
- BEK partners and outsources many functions to gain scale and efficiency.
- **Rural doesn't mean inefficient...it means RURAL!**



*BEK Works Along Side
Other Businesses at an
Event in Strasburg, ND*

BEK

Rural Work From Home

- Medical transcription
- Real-time drive through orders processing
- Real-time online customer service
- Scholastic grading
- Bill processing
- Data entry
- Travel consultants
- Distributed sales
- Software development
- Businesses supporting work from home employees in BEK area:
 - Aetna, Coventry, NISC, St Alexis Hospital, Med-Center Hospitals, Basin Electric, Verity, University System, American Express Trinity Health Care, Home Schooling
- **Internet connection instability & latency cause JOB LOSS.**
 - Prohibit work from home via wireless connections



BEK at Business in
Wilton, ND Conducting
BEKTV Training



Educational Difficulties with Poor Quality Internet

- Challenges experienced
 - Loss of connections
 - Connection time-outs
 - Poor signal quality
 - Insufficient bandwidth
 - Broken sound and video
- Test taking
 - Loss of connection **causes test failure**
 - Tests have **time limits**
 - Need to **re-enter answers**
 - Lock out after **multiple disconnects**



Teen Group Stops by BEK Headquarters in Steele, ND for Educational Tour

BEK

Slow and Steady Progress

- Incremental history (Long Term View)

- Party line on fence posts
- Party line on poles
- Private line on poles
- Private line in ground
- Digital switching
- Dial-up Internet
- Fiber to the home
- Broadband Internet
- Analog & IP TV



BEK Brings the Community
out for a Local Brat Feed
in Steele, ND

- Investment in communications must continue in the rural, to prevent the rural economic collapse.

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The logo for BEK Communications, featuring the letters "BEK" in a bold, red, italicized sans-serif font. The letters are enclosed within a white circle that has a blue outline. This circle is centered within a horizontal white bar that has blue ends.

Why Are Communications Services So Important in the Rural Landscape?

Presented By:

Derrick Bulawa, GM/CEO

BEK Communications Cooperative - Steele, ND

June 22, 2011

BEK Communications

Connections that matter.

BEK Communications

LETTERS OF SUPPORT

- Linton Hospital
- National Information Solutions Cooperative
- Kidder County Public Schools
- Emmons County Sheriff's Office
- City of Wilton
- Wishek Community Hospital and Clinics
- Kidder County Sheriff's Department
- Strasburg Public School
- Strasburg Insurance Agency
- Kidder County Community Health Center
- Braddock Fire Department
- Emmons County ALS Ambulance Service
- Kidder County
- Linton Public School District No. 36
- Teleworkers who depend on BEK for Broadband and Telephone Connections



LINTON
HOSPITAL

June 17, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Proposed changes to Universal Service Fund

Dear Mr. Genachowski,

The Linton Hospital, located in Linton, North Dakota provides healthcare and emergency services to the Linton area as well as communities surrounding it.

Having reliable internet and phone service is vital in our organization. Key components of our operations system rely on it... Without BEK Fiber as the backbone for our services, day to day operations would basically halt.

Currently, BEK supports

TV

- Hospital rooms equipped with BEK TV for leisure viewing and emergency broadcasting

PHONE

- 911 services
- Communications within organization as well as external

INTERNET

- Bioterrorism Access Network
- Greater accessibility for processing documents
- X-rays captured digitally – this allows them to be sent off site for viewing and results back in as little as an hour
- Electronic reporting

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Our hospital is too small and limited in funds to have full time specialty doctors on staff. By having electronic transmissions, it gives us a better avenue for communicating with larger facilities, thus giving us an opportunity to make better judgment calls and expedite issues. This is an extremely important factor since the Linton Hospital is more than one hour from a critical care facility and when trying to save a life, time is of the essence.

When considering your options, I hope you also consider the impact of your decision. By reducing the Universal Service Funds, it would not only have a significant adverse impact on our local telephone company, but would in turn affect businesses in our rural North Dakota communities.

Sincerely,

A handwritten signature in cursive script that reads "Beverly Vilhauer". The signature is written in black ink and has a long, sweeping flourish extending to the right.

Beverly Vilhauer, CFO/COO
Linton Hospital - North Dakota

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Julius Genachowski, Chairman
Federal Communications Commission
415 12th Street SW
Washington, DC 20554

Dear Mr. Genachowski:

One of the challenges facing rural America today is a need for income sources in small towns with shrinking populations. One of the solutions to that has been found through technology and improved communication infrastructure. Virtual employment allows residents in small towns across the country to work for nationally recognized companies and make an above average income for the local area. It also expands the employment pool, as National Information Solutions Cooperative (NISC) has happily discovered.

With roots in rural America and Members serving small towns daily, NISC has embraced the virtual employee culture. The addition of virtual employment to the organizations also means we are able to hire talented individuals from across the nation.

Today NISC employs 91 people in a virtual capacity. A wired, 2 MB upload/ 2 MB download connection is the standard for all NISC virtual employees. We have found that a wired connection is less likely to be interrupted by weather and other outside factors.

Virtual employees must maintain a constant connection during working hours. Our policy expects employees to be able to communicate via email, video conference, chat as well as connect to our iVUE customer service database software. A reliable connection is necessary for virtual employment to be successful for NISC.

NISC is pleased with the wired connections BEK has provided to our virtual employees and well as friends and neighbors. We hope you will continue to provide this necessary service.

Sincerely,



Vern Dosch
President/CEO
National Information Solutions Cooperative



Board of Education
Brent Stroh, President
Pam Binder, Vice President
Kathy Benson
Burdell Johnson
John Lemieux
Jason Schmidt
Robin Ziesch

Kidder County Public Schools
Administrative Office
101 Fourth Street South East
PO Box 380
Steele, ND 58482
(701) 475-2243 Fax: (701) 475-2737

Administration
Ken Miller, Supt.
Darnell Schmidt, H.S. Prin.
Thomas Six, H.S. Prin.
Shelly Maun, Elem. Prin.
Kay Mayer, Elem. Prin.
Anne J. Kalianoff, Bus. Manager
Karen Arnold, Admin Assistant

June 15, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: FCC Pending Universal Service Fund Reform

Mr. Chairman:

Kidder County Steele Public School located in Steele, N.D. educates students from Steele, Tappen, Dawson, Tuttle, Pettibone, Sterling, Robinson, and Driscoll.

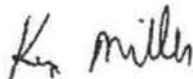
We subscribe to BEK phone and Internet services and are planning to get TV service in the near future. With BEK Fiber, we are able to access the North Dakota state network. This network gives us access to various applications such as PowerSchool. This allows parents the ability to view their students' grades online. Additionally, we participate in the Great Western ITV Network, offering students 12 classes per day. Classes, such as art and foreign languages, would otherwise not be available. Once we receive our TV service from BEK, we will be able to integrate with our SmartBoards to allow teachers to use educational channels to teach students in the classrooms.

Using BEK's telephone service for our reverse 911 system has allowed us to reach to students' families by phone with important information such as late school starts and school closings due to weather.

If we did not have the connectivity that BEK brings to us over BEK Fiber, it would be devastating to our school and none of the above would be possible. Our students in this rural area would be at a huge disadvantage.

On behalf of the Kidder County Steele Public School, I appreciate your consideration when reevaluating the Universal Service Fund that gives BEK Communications the ability to provide our school with communications services.

Sincerely,



Ken Miller, Superintendent
Kidder County Steele Public School

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Emmons County Sheriff's Office

Phone (701) 254-4411 * Fax (701) 254-5311 * gsanders@nd.gov

Gary Sanders, Sheriff P.O. Box 159 * Linton, North Dakota 58552-0159

June 17, 2011

Federal Communications Commission
Attn: Chairman Julius Genachowski
445 12th Street SW
Washington, DC 20554

Dear Chairman Genachowski,

I am writing this letter in regards to the FCC's review of the Universal Service Fund.

The Emmons County Sherriff^o Office is located in Linton, North Dakota, a rural community of approximately 1,300 people.

As a small rural sheriff's office, I would like to stress the importance of BEK Communications Cooperative's role in offering us and the other emergency services and various first responders' reliable telephone and internet service over BEK Fiber. Without the funds that BEK receives through the Universal Service fund, I fear that our services that we have come to rely so heavily on would no longer be available, or be available at a much higher cost. This would make it extremely difficult, if not impossible to conduct daily business or provide other emergency services such as maintaining our 911 database information.

The 911 database for obvious reasons is imperative to our community's safety and well-being in various emergency situations. It's a complex system that is dependent on technology to provide crucial information that minimizes the risks in life and death situations. The information provided needed to maintain an accurate and up to date 911 database is currently only provided by BEK Communications since cellular companies or other utility companies are not required or appear to be interested in providing this crucial information.

BEK Fiber also gives us the ability to access databases through the state network, such as the criminal justice database. Being able to access these databases is crucial in obtaining information in a time sensitive matter.

The functionality of our offices is dependent on the services we're able to utilize by having BEK Fiber. We strongly urge you to think of our rural facilities when considering the implications of decreasing the Universal Service Funding.

Sincerely,

Gary R. Sanders, Sheriff / 911 Coordinator
Emmons County Sheriff's Office

SERVING THE COMMUNITY WITH PRIDE

CITY OF WILTON
P.O. BOX 278
121 DAKOTA AVE.
WILTON, ND 58579
PHONE: 701-734-6707
FAX: 701-734-6708
WEB SITE: www.wiltonnd.org
[e-mail: wiltonnd@bektel.com](mailto:wiltonnd@bektel.com)

June 17, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Mr. Chairman:

Wilton is a rural community located in central North Dakota with a population of 800.

As many rural communities located in central North Dakota, we rely on telephone, internet and television services provided by BEK Communications. While many people call our office for city information such as billings, our website is our main resource for providing our residents and visitors with all of the information necessary to live in and be involved in our community. Upcoming events and local weather are also available on BEK's TV service. The internet service is also a must for our office to conduct the everyday activities such as submitting payroll EFT payments, reports to the IRS and city information to the state office. We also conduct the majority of our business through emails. This just names a few of the ways we rely on our communication services.

Without BEK services, our office would be a disaster. We would be spending more money and time on mailings and travel expenses. It would also be more difficult to meet our deadlines and keep our residents up-to-date on community activities, information, and services.

In closing, I would ask that you consider how rural cooperatives, such as BEK, may be adversely affected by the reduction of universal funding and how it will affect so many rural businesses and local government offices.

Sincerely,



Kelly Bauer
Auditor
City of Wilton

WISHEK COMMUNITY HOSPITAL AND CLINICS

1007 4TH AVE. SOUTH
P.O. BOX 647
WISHEK, NORTH DAKOTA 58495

(701) 452-2326
FAX (701) 452-2392

June 17, 2011

Julius Genachowski, Chairman
Federal Communications Commission
415 12th Street SW
Washington, DC 20554

Dear Mr. Chairman:

The Wishek Community Hospital has proven to be a healthcare leader in South Central North Dakota since 1954. We are a 24-bed Critical Access Hospital with four satellite clinics serving a three-county rural area. We are community owned and our employees have a great dedication to the well-being of patients because they live, work and play in our service area.

The news of the FCC considering a reduction in the Universal Service Fund has prompted me to write this letter. If funding is cut, I'm concerned it could have a major affect on our local telecommunications companies and the services they provide. Cost is always a major factor for rural facilities on limited budgets. Can you guarantee that we'll continue to receive the quality services that we have come to rely on from BEK Fiber without a substantial increase?

We are dependent on BEK Fiber for our phone, internet and TV services. Reliable communications services are crucial and we depend on:

- Multi-line phone system and ability to fax
- Internet - for scheduling appointments, prescription refills, accessing patient charts, electronic reporting, patient communications, lab reports, obtaining referrals, communicating with outside medical staff, and collaborating with our satellite clinics as well as other care providers.

We strive everyday to provide the best quality of healthcare possible in our remote area of North Dakota. The Wishek Hospital urges you to consider the importance of the Universal Service Fund in our rural communities.

Sincerely,



Trina Schilling - CEO
Wishek Hospital
Wishek, North Dakota

CLINICS IN:

WISHEK • NAPOLEON • KULM • GACKLE



Kidder County Sheriff's Department

Sheriff John Lemieux
Chief Deputy Trent Anderson
P.O. Box 318
Steele, ND 58482
PH (701) 475-2422
Fax (701) 475-2298

June 16, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: FCC Review of the Universal Service Fund

Dear Mr. Genachowski:

I am writing in support of BEK Communications Cooperative, a rural telephone company from which Kidder County Sheriff's Department in Steele, ND receives their phone and internet via BEK Fiber.

It is my understanding that the FCC is considering regulatory changes that would greatly affect the amount of funds provided to BEK, thus creating a loss in revenue by a considerable amount. These pending changes impacting BEK concern us in that as a rural Sheriff's office, we have come to rely heavily on the services that BEK is able to provide us in running our offices efficiently.

There are so many things/applications that are dependent on reliable phone and internet connectivity through BEK Fiber. To name a few:

- 911 Service
- Electronic tickets
- Background, License and Warrant checks
- Accessing state records
- Record Retention

Basically, everything is reliant in some shape or form on electronic data transmission. As a younger generation sheriff, I question whether a "paper pushing" office is even an option, certainly not a cost effective one. As a rural community with limited funding, being able to access pertinent data in a timely fashion helps keep our costs down so we can concentrate on maintaining a safe community for our citizens to reside.

We hope while evaluating the Universal Service Fund, you consider the communities in rural America and the impact it would have on them.

Sincerely,


John Lemieux, Kidder County Sheriff
Steele, ND



Strasburg Public School



Daren Kurle, Supt./Elem. Prin
Robert Bubach, HS Principal
Brent Kleinsasser, Counselor

**307 West Main St.
P.O. Box 308
Strasburg, ND 58573
Phone: (701) 336-2667
Fax: (701) 336-7490**

Duane Ternes, Board Pres.
Terri Kuss, Bus. Mgr.

June 16, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Universal Service Reform

Mr. Chairman:

Strasburg, ND is located in South-central North Dakota near the South Dakota State border. We are located in a rural area of the state. There are approximately 140 students in grades K-12 who attend Strasburg Public School.

A solid Internet connection is crucial in rural area schools. Maybe even more crucial than in urban schools because rural schools are not always afforded the same resources.

Connection through BEK Fiber is what makes many things possible at Strasburg Public School. Utilizing the Internet, we are able to offer the following:

- PowerSchool for Parents to View Grades Online
- ITV Classes for Students that Strasburg School Otherwise Couldn't Offer:
 - Medical Careers Class
 - Medical Terminology
 - IT Essentials
- ODIN (Online Dakota Information Network) Library
- Internet Filtering for Students

BEK provides Strasburg Public School with phone and Internet services. Without BEK's services, Strasburg Public School would not be able to be as successful at educating students.

Strasburg Public School asks that the FCC works to keep BEK Communications funded through the USF so they can continue to provide mission critical services to rural North Dakota.

Sincerely,

A handwritten signature in cursive script that reads "Daren Kurle". The signature is written in black ink and is positioned above the typed name.

Daren Kurle, Superintendent
Strasburg Public School



Strasburg Insurance Agency

P.O. Box 307 • 720 Main St.
Strasburg, ND 58573-0307

Phone: 701-336-2666
Fax: 701-336-2669
Shar Nagel, Agent

June 18, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Mr. Chairman,

I manage an insurance agency located in Strasburg, ND which is located in south-central North Dakota. Life and business in a rural setting is contingent on relationships, honesty, exceptional service, and of course, good communications services.

BEK Communications provides us with our phone and Internet services that we need to function daily as a business. We use BEK Internet to conduct business. We use the Internet to quote out individual and business insurance policies as well as to endorse current policies.

Without these services I'm just not sure what we would do. We would have to use cell phones and be subject to the coverage that comes along with them.

We simply ask that the FCC considers rural businesses when deciding what to do with Universal Service Funding. We are reliant on affordable communications services from BEK for our day-to-day operations.

Sincerely,

A handwritten signature in cursive script that reads "Shar Nagel".

Shar Nagel, Manager
Strasburg Insurance Agency

REDACTED - FOR PUBLIC INSPECTION

Kidder County Community Health Center
110 West Broadway / PO BOX 54
Steele, ND 58482
Phone 701-475-2910
Fax 701-475-2815

June 15th, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Mr. Chairman,

It has come to my attention that the Federal Communications Commission is considering a reduction in the Universal Service Fund. I would urge you to reconsider this as it would have widespread destructive consequences on the care we provide our patients and rural patients throughout the nation. We are a Rural Health Clinic that is located 45-55 miles from the nearest hospital and our dependence on the use of computers and technology increases daily. The Centers for Medicare and Medicaid are currently providing financial incentives and strong encouragement for adaptation of Electronic Health Records with the best interest of patients in mind. How are we to continue to invest in technology to provide the best quality of care for patients if the resources that make it possible are being depleted?

We are very grateful for the commitment that has been shown by our local cooperative, BEK Communications, in the investment of technology and enhancement of services in our community. Their provision of advanced telecommunication services directly impacts our day to day operations. We are very reliant on multiple phone lines, fax and internet service in order to schedule appointments, access our patient charts, provide prescription refills, obtain referral information, patient communication, entering of patient lab orders and obtaining results as well as collaborating with hospitals and other patient care providers.

If the funding is cut I am certain that the same level of service that we depend on could not be provided at the same cost and we cannot afford a substantial increase to maintain these services. A reduction in funding would mean our hard earned investment in an electronic platform to provide patient care would have been wasted because it cannot be utilized without the level of service we have now. Life and the provision of health care are only going to become more reliant on telecommunication, especially for remote facilities like ours. Almost all of the services we are hoping to bring this community expand on our use of technology including virtual consultations with specialists outside the area, transmission of EKGs to the hospitals, and the ability to capture and transmit x-ray images to remote radiologists with use of computers.

We are working very hard to serve our patient population at a level as close to equivalent as is practical to patients in urban areas and this will not be possible without the continued support of rural phone companies and the Universal Service Fund. Please reconsider other areas of the budget that will not impact so many lives and stunt the progress we are all making by working together. Your continued support is an integral part of our success and we ask that you please consider our request.

Thank you,



Jennifer Liebert
Clinic Manager

REDACTED - FOR PUBLIC INSPECTION

June 18, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Mr. Genachowski:

I'm writing you regarding your pending Universal Service Funds reevaluation because I am personally a member of BEK Communications Cooperative and publically the Braddock Fire Department Fire Chief and President.

BEK Communications provides the Braddock Fire Department with one MAJOR Service – Phone. With our phone lines at the fire department, we are able to take fire calls and respond to them in a timely fashion. Our Fire station phone number additionally rings various Volunteer fire fighters phones around town ensuring quick response from our part-time fire fighters. Without phone service we wouldn't be able to respond to fires, accidents or medical emergencies to help our fellow Braddock-area residents. The other surrounding Fire Departments also use the fire phone to call our fire Department for aid.

Please consider our rural fire departments when making your decisions about what to do with Universal Service Funding. A negative impact on our local telephone companies is a negative impact on us. We need service at affordable prices.

Sincerely,



Mark Naaden, Fire Chief & President
Braddock Fire Department

REDACTED - FOR PUBLIC INSPECTION



Emmons County ALS

Linton Hospital

Po Box 850 518 N. Broadway Linton, ND 58552

701-254-4511 Emmonscoals@yahoo.com

Director - Roger Martin, NREMT-P

Ambulance Supervisor - Nolan Anderson, NREMT-F



 June 18, 2011

Julius Genachowski, Chairman
 Federal Communications Commission
 445 12th Street SW
 Washington, DC 20554

RE: Universal Service Fund Reform

Dear Mr. Chairman:

Emmons County ALS Ambulance, located in Linton, ND, subscribes to phone, Internet and TV from BEK Communications. All of these services are brought to us over BEK Fiber.

As you can imagine, an ambulance service is heavily reliant on these services to save lives, learn new skills and for the upkeep of staff morale. BEK services prevent us from having to send staff to conferences that we simply can't afford.

BEK phone service helps us stay in contact with surrounding ambulance services and contact staff to arrange on-call schedules. A phone connection is how we receive our calls that dispatch us to medical emergencies.

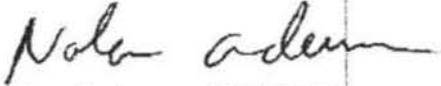
BEK Internet service is something the Emmons County ALS Ambulance sees as a necessity. We use the Internet to keep up to date on new skills, medical trends and new medicines. Medicines and treatments seem to change daily and keeping up with them can mean saving a life.

BEK TV service is a huge morale booster for our staff. Staffers watch BEKTV during their downtime.

If we didn't have BEK services, it would be devastating for the Emmons County ALS Ambulance. There's no doubt that you can see how an ambulance service needs sufficient communications services. We hope that you will keep us in mind when evaluating the Universal Service Funds that BEK receives. We need to be able to continue to receive quality communications services at an affordable price.

REDACTED - FOR PUBLIC INSPECTION

Sincerely,



Nolan Anderson, NREMT-P
Ambulance Supervisor- Emmons County ALS Ambulance Service
PO Box 850
Linton, ND 58552
701-254-4511



KIDDER COUNTY

P.O. BOX 167
STEELE, NORTH DAKOTA 58482

COUNTY COMMISSIONERS:

Daniel Moch, Chairman
David Heaton
Don Rudolph

Michelle Keily, County Auditor
Phone: 475-2632 Ex. #9218
Kim Larson, Deputy
Phone: 475-2632 Ex. #9219
FAX: 475-2202

June 14, 2011

Julius Genachawski, Chairman
Federal Communications Commission
445 12th St SW
Washington DC 20554

Dear Mr. Genachawski,

Kidder County is located in south central North Dakota. Our county covers 1433 square miles and has a population of just over 2200 residents.

As a rural county, we rely highly on our telephone and fiber connections provided by BEK Communications. While our phone may be the main way that the county residents contact us, internally the internet service provided through BEK's fiber is essential for everyday business. Each office uses web based programs to submit and retrieve information necessary for conducting our county's business. Here are some of the ways we rely on our communication services:

- Online education through the Learning Management System
- County election information is submitted through the web based program "ND Voices"
- 911 information
- Clerk of Court Office is entirely web-based

This lists just a few ways in which we use our communications services. Without these services, we would not be able to function like we do today. It would be detrimental to our everyday operations. Expenses would be greatly increased because of travel expenses and time away from the office.

When reviewing how USF funds are handled in the future, please take into consideration the rural areas that rely greatly on our communications services.

Thank you,

Michelle Keily
Auditor
Kidder County



LINTON PUBLIC SCHOOL DISTRICT NO. 36

101 NE 3RD St. - PO Box 970
Linton, ND 58552



June 15, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Mr. Chairman,

Located in south-central North Dakota, Linton Public School is a rural-based school with approximately 300 students.

Linton School has utilized BEK phone, Internet and TV services for several years. Because we have BEK Fiber directly to the school, we have the amazing ability to offer students a level of education they would not be able to receive without it. We are able to offer online classes to students as well as up to 14 classes per day over ITV, such as:

- German
- Spanish
- College Courses
- Art
- IT Classes
- Electronic Classes
- Science Classes

Linton School also uses BEK's TV service in the classroom as an educational tool. Teachers use channels such as the History Channel, Discovery Channel and News channels to educate students.

There's no doubt that Linton Public School needs BEK Communications' services in order to operate.

Linton Public School asks that you take us into consideration when you reconsider Universal Service Funding. Please keep in mind that the funding you provide to BEK Communications has an effect on our school and community.

Sincerely,

A handwritten signature in cursive script that reads "Donna Schneider".

Donna Schneider, Secretary
Linton Public School

Brian W. Flyberg
Elementary/Middle School Principal
Phone: 701-254-4173
MS Fax No: 701-254-0159

Alan C. Bjornson
Superintendent/HS Principal
Phone: 701-254-4138
HS Fax No: 701-254-4313
HS Office No: 701-254-4717

REDACTED - FOR PUBLIC INSPECTION

June 16, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Mr. Chairman:

I am a Claims Reporting and Special Services Analyst for Aetna Insurance Company, office located in Bismarck, ND. I work from my home in Wing, ND a small town of approximately 175 people located 45 miles NE from Bismarck.

The work at home telework benefit option from Aetna has only been available for the past 5 years in North Dakota with Aetna, Inc and it is my understanding that in North Dakota more than 150 employees choose this option once available. In our area the ability to do this remains entirely dependent upon BEK Communications being able to provide the necessary infrastructure of high speed Internet and solid telephone service to our rural home locations. My job requires the ability to receive and send large quantities of information over the Internet, to have interactive online training and to maintain consistent stable communication with my supervisor and peers. Because of my telework position my company gets lower absenteeism from me and more productivity, they are able to hang on to valuable talent due to increased employee satisfaction, and I'm able to balance worklife with my personal life. With Aetna being able to offer this type of position because of BEK Communication providing the high quality services for this opportunity, I am definitely a satisfied employee and have no plans to leave my job with Aetna or leaving a life supporting a small town community.

Without the ability to work from home it is not cost effective to stay living in a small rural community, considering time, travel and other personal sacrifices. Keeping our economic dollars in the Wing area is also keeping our children in the local school and helping this small community stay alive. My husband ranches and my job is our sole consistently dependable source of income. This has a huge impact on our family life.

If BEK Communications and other telecommunication companies cannot continue to upgrade technology and provide high quality services to meet the demands of major employers like Aetna, I would be devastated. I have no other options to get high speed Internet and it is critical that BEK be also able to provide these services at a reasonable cost. If BEK was unable to provide me the services I needed for doing work at home, it is possible based on my contract with Aetna that I might not be able to return to the office in Bismarck for my position due to no space available, and that would result in me having to voluntarily resign my employment. This would have a huge impact on my family financially and on our small town community.

REDACTED - FOR PUBLIC INSPECTION

I am requesting, adamantly seeking, that you take action to the benefit of our small rural telecommunications company. Do not take away the revenues that come from high cost universal support and fees from long distance carriers. It would have a huge and dramatic effect on our local communities.

Sincerely,

Sheri W Fischer

Sheri Fischer

June 17, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Mr. Julius Genachowski,

I work for a company called Aetna that is based out of Bismarck, ND. I am fortunate enough to be able to work for Aetna out of my home which is located in Steele, ND, about 40 miles away from Bismarck.

There is no doubt that I rely on my phone and Internet connections, provided by BEK Communications, to work. Online, I am able to access the Aetna network, email with work, conference call with my boss and simply get my general business done.

Without BEK phone and Internet service, I would have to drive the 40 miles (80 miles round-trip) to get to work every day. Not only does working from home save me the miles on my car, but it saves me gas money, saves me money on daycare and saves me time.

Aetna also benefits from employees like me being able to work from home. They don't have the overhead costs of maintaining office space for employees.

I appreciate your consideration when deciding on Universal Service Funds for rural America. Many of us need communications services at affordable prices in order to work.

Sincerely,

A handwritten signature in cursive script that reads "Bobbi Peterson". The signature is written in black ink and is positioned above the printed name.

Bobbi Peterson

June 17, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: FCC Universal Service Reform

Dear Chairman Genachowski:

I am Cindy Muhlhauser from Strasburg, N.D., technically I am from rural Strasburg. I have had the most awesome opportunity the past five years to be able to work-from-home and it has been a godsend for me. I have reliable phone and Internet connections from a local service provider, BEK Communications located in Steele, N.D. which makes my work-from-home job possible.

I work for Coventry Health Care and I process insurance claims. My job is production oriented. I am required to have a reliable high speed Internet connection to meet my daily quota. My Internet connection from BEK enables me to work-from-home, worry free, which is crucial for me because my husband is disabled and I am the family breadwinner. Since my service provider is local, they realize the importance of service reliability for me.

I understand that you have some tough decisions to make regarding Universal Service Funding for rural telecommunications companies like mine. I realize that the decisions made could have either a positive impact or create devastation for people like me in rural America. I hope you choose the positive approach.

If I lost my phone or high speed Internet connection, or if the quality of these connections was lessened because of restrictions or funding cuts to my service provider, I would be faced with a 180 mile daily commute to work or I would have to move. This isn't just about me; it's about the future of rural America. We cannot survive without our current technology; we need it so much and we think we deserve the technology we know is attainable.

Please consider the plight of rural America as your committee debates proposals to the Universal Service Fund and how your decisions will impact companies like BEK, people like me and rural communities across the nation.

Sincerely,


Cindy Muhlhauser

June 17, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: FCC Universal Service Reform

Chairman Genachowski:

My name is Patty Tschritter. I live and work in rural Strasburg, N.D. Recently I became aware of an important issue on your agenda which is what has prompted me to write. The reform to the Universal Service Fund is a critical issue for me because of the possible negative impact it may have for me. My phone and Internet service provider (BEK Communications, Steele, ND) has been able to equip me with the necessary communications services I need to perform my work-from-home job. Jobs are sparse in my community; a work-from-home job is an ideal solution for me.

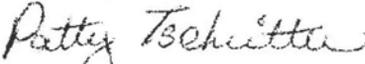
I work for American Express Travel. They have provided an awesome work opportunity for me aided with connections from BEK Communications. A reliable phone and high speed Internet connection is absolutely necessary for me. I book corporate travel, both domestic and international; air and train. I process approximately 20 calls per day.

BEK Communications has been diligent in their efforts to deliver fiber to the home to their subscribers. A good Internet connection is critical for everyone to stay connected. It is critical for me and I assume it is critical for you too. Businesses rely on good connections, I know my employer does.

Help keep rural people connected. I've got some of the best technology available to me today; without it I would lose my job!

There must be a way to keep the momentum going for rural telecommunications companies, like BEK, so that they can continue to offer high tech services to the people in the rural communities who serve and provide to the rest of the world. I live in a great state that has many resources available to the rest of the country. We are able to deliver our resources and talents with reliable connections. Preserve what we have worked so hard for and please support our local service providers.

Sincerely,


Patty Tschritter