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September 15, 2011

**VIA ELECTRONIC FILING**

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

**Re: Notice of Ex Parte Meeting  
American Broadband & Telecommunications Petition for  
Forbearance from Eligible Telecommunications Carrier Facility  
Requirements - WC Docket No. 09-197**

Dear Ms. Dortch:

On September 14, 2011, Tamar E. Finn and Kimberly A. Lacey of Bingham McCutchen, LLP, counsel to American Broadband, met with Margaret McCarthy, Legal Advisor to Commissioner Capps of the Federal Communications Commission (“Commission”). Jeffrey S. Ansted, President of American Broadband & Telecommunications (“American Broadband”), joined the meeting by conference call.

Mr. Ansted discussed the Petition for Forbearance filed by American Broadband in WC Docket No. 09-197 on February 25, 2011 (“Petition”). Mr. Ansted explained that American Broadband is seeking forbearance that would permit it to apply for non-facilities based wireless authority to provide Lifeline-only services in rural areas in Ohio, described the company’s work with state government agencies and community organizations to educate qualified individuals about American Broadband’s current wireline Lifeline service offerings, and reiterated its request for expedited treatment of the Petition. Specifically, American Broadband explained that time is of the essence and there is significant support for the provision of these services in Ohio, as shown by the attached letters from Lucas County Department of Job and Family Services and ODJFS Cuyahoga County, which were previously filed in this proceeding. American Broadband

Boston  
Hartford  
Hong Kong  
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New York  
Orange County  
San Francisco  
Santa Monica  
Silicon Valley  
Tokyo  
Washington

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urged the Commission to grant its petition in conjunction with the similar PlatinumTel petition that must be decided by September 30, 2011.<sup>1</sup>

In addition, the participants discussed the status and timing of similar forbearance petitions,<sup>2</sup> including the status of multiple compliance plans filed by providers after their petitions for forbearance were granted.<sup>3</sup> Mr. Ansted urged the Commission to move forward on the American Broadband Petition and compliance plan so that low-income people in rural Ohio and other states may benefit equally from this program.

The positions expressed by Mr. Ansted and Ms. Finn are consistent with American Broadband's prior filings in this proceeding, including but not limited to those positions stated on pages 1-2, and 9 of its Petition and on pages 1-2 of its Reply Comments filed on September 9, 2011.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter has been filed via ECFS and sent by email to Margaret McCarthy. If you have any questions, please do not hesitate to contact me at (202) 373-6117 or [tamar.finn@bingham.com](mailto:tamar.finn@bingham.com).

<sup>1</sup> See *PlatinumTel Communications, LLC Petition for Forbearance*, Order, WC Docket No. 09-197, DA 11-1038 (June 9, 2011).

<sup>2</sup> Besides the PlatinumTel, LLC, CAL Communications Inc. and ReCellular, Inc. petitions for forbearance, which are currently part of an order on circulation at the Commission, there are four other similar petitions pending at the Commission. See *Petition for Forbearance of Zefcom, LLC d/b/a Telispire PCS*, WC Docket No. 09-197 (filed Jan. 13, 2011); *Petition for Forbearance by Millennium 2000, Inc.*, WC Docket No. 09-197 (filed April 12, 2011); *Petition for Forbearance by North American Local, LLC*, WC Docket No. 09-197 (filed April 28, 2011); and *Petition for Forbearance by Total Call Mobile, Inc.*, WC Docket No. 09-197 (filed May 25, 2011).

<sup>3</sup> See *e.g.*, *i-wireless, LLC's Compliance Plan*, WC Docket No. 09-197 (filed July 26, 2010).

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Very truly yours,

*/s/ electronically signed*

Tamar E. Finn  
Kimberly A. Lacey

cc (by e-mail):

Margaret McCarthy  
Angela Kronenberg  
Zachary Katz  
Christine Kurth  
Trent Harkrader  
Patrick Halley



Board of County  
Commissioners  
**Pete Gerke**  
*President*  
**Tina Skeldon Wozniak**  
**Ben Kono**

**Department of Job  
and Family Services**  
Deb Ortiz-Flores  
*Director*

May 2, 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Ms. Dortch:

We are writing in support of American Broadband & Telecommunications' ("AB&T's") petition filed with the FCC in WC Docket No. 09-197. We believe that the low-cost wireless telephone services proposed by AB&T will provide a vital service to the low income residents of Ohio that we serve.

**Lucas County Department of Job and Family Services** provides assistance and services to qualified residents of Ohio, such as food stamps, Heating Assistance, Medicaid, etc. We have discussed with AB&T the need for low-cost wireless telephone services in the state, and understand that AB&T is seeking FCC action that will permit it to apply for authorization by the Ohio Public Utilities Commission to become a provider of wireless services supported by the federal Lifeline program. Although we currently assist low income residents in signing up for wireline Lifeline service, adding a wireless Lifeline choice would be a great asset to the community and a resource to this agency's continued outreach efforts to the low income residents of Ohio that we serve. The individuals whom we assist frequently change residences at a higher rate than other members of the community and mobile telephone services would help them keep in contact with assistance organizations, employers and other vital resources. Through our partnership with AB&T, we will help provide information about these low-cost wireless services to eligible residents and to help qualified individuals become aware of and use these services.

There is an urgent need for AB&T's proposed services in Ohio, and we ask the Commission to expedite its review of the petition and promptly grant the requested authority.

Sincerely,

Betty Rios  
Community Liaison  
Lucas County Job & Family Services



May 3, 2011

Marlene H Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Ms. Dortch:

We are writing in support of American Broadband & Telecommunications' ("AB&T's") petition filed with the FCC in WC Docket No. 09-197 (But do not bind ODJFS Cuyahoga County for offering wireless services at our centers). We believe that the low-cost wireless telephone services proposed by AB&T will provide a vital service to the low income residents of Ohio that we serve

ODJFS Cuyahoga County provides assistance and services to qualified residents of Ohio, such as food stamps, Heating Assistance, Medicaid, etc. We have discussed with AB&T the need for low-cost wireless telephone services in the state, and understand that AB&T is seeking FCC action that will permit it to apply for authorization by the Ohio Public Utilities Commission to become a provider of wireless services supported by the federal Lifeline program. Although we currently assist low income residents sign up for wireline Lifeline service, adding a wireless Lifeline choice would be a great asset to the community and a resource to this agency's continued outreach efforts to the low income residents of Ohio that we serve. The individuals whom we assist frequently change residences at a higher rate than other members of the community and mobile telephone services would help them keep in contact with assistance organizations, employers and other vital resources. Through our partnership with AB&T, we will help provide information about these low-cost wireless services to eligible residents and to help qualified individuals become aware of and use these services.

There is an urgent need for AB&T's proposed services in Ohio, and we ask the Commission to expedite its review of the petition and promptly grant the requested authority.

Sincerely,

Jacquelon Ward, Interim Director

cc: Robert Math  
Aida Idiaquez

Employment & Family Services, 1641 Payne Avenue, Cleveland, Ohio 44114, (216) 987-7000  
Ohio Relay Service (TTY) 711

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