KENNEBEC TELEPHONE CO., INC.
P.O. Box 158 - 220 S. Main
Kennebec SD 57544
605-869-2220 fax 605-869-2221

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Federal Communications Commission
Office of the Secretary

WC: 10-90
GN: 09-51
WC: 07-135
WC: 05-337
CC: 01-92
CC: 96-45
WC: 03-109
WT: 10-208

March 2, 2012

VIA EMAIL

Ms. Amy Bender
Deputy Division Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *WC Docket No. 10-90, Connect America Fund; GN Docket No. 09-51, National Broadband Plan for our Future; WC Docket No. 07-135, Establishing Just and Reasonable Rates for Local Exchange Carriers; WC Docket No. 05-337, High-Cost Universal Service Support; CC Docket No. 01-92, Developing a Unified Intercarrier Compensation Regime; CC Docket No. 96-45, Federal State Joint Board on Universal Service; WC Docket No. 03-109, Lifeline and Link-Up , Universal Service Reform – Mobility Fund, WT Docket No. 10-208*

Dear Ms. Bender:

Kennebec Telephone Company is a rate-of-return regulated rural telephone company and a member of the South Dakota Telecommunications Association (SDTA) and we presently have concerns with the accuracy of certain input data being used by the Commission in its statistical or "Regression Analysis" model that is proposed for use in limiting ROR carrier capital and operating expense recovery. Our concerns were briefly mentioned in recent comments filed by SDTA in the above referenced docketed proceedings (see SDTA Reply Comments dated February 17, 2012, pp. 22-23).

More specifically, to this point, we have discovered that the geographical mapping data used as an input in the model for the Kennebec Telephone Company rural service area is substantially inaccurate. The Commission's input file contains 305.633 square miles as the land area served by Kennebec Telephone. The actual size of our service area or study area is 742 square miles. The prospect that this inaccurate data may be relied on for purposes of determining future high cost funding distributions to Kennebec Telephone is a matter of great concern and we would like to have some assurances that the incorrect input data will be corrected. Accordingly, we would ask at this time what process, if any, is in place to allow for such corrections and whether any additional action is expected of Kennebec Telephone as part of this process.

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We are hoping that the Commission has already taken steps to correct these errors with the model input data, but certainly would like to know if more information is expected of us in order to facilitate the necessary data corrections.

Please feel free to contact me directly with any information you have on this matter (at 605-869-2220). We are also certainly willing to meet with anyone at the Commission on this matter, if that is desired.

Sincerely,

/s/ Rod Bowar
Rod Bowar
CEO/President/General Manager
Kennebec Telephone Company, Inc.