West River Cooperative Telephone Co.

801 Coleman Ave. P. O. Box 39 Bison, SD 57620

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

March 2, 2012

FILED/ACCEPTED
MAR 5 2012
Federal Communications Commission
Office of the Secretary

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:

West River Cooperative 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 West River Cooperative Telephone Company rural service area is substantially inaccurate. The Commission's input file contains 260.557 square miles as the land area served by West River Cooperative Telephone Company. The actual size of our service area or study area is 6,209 square miles. In addition, it was also discovered that the housing units for West River were incorrect. The Commission's input file contains 564 housing units, while the actual number of housing units reported by West River is 3,526. The prospect that this inaccurate data may be relied on for purposes of determining future high cost funding distributions to West River Cooperative Telephone Company is a matter of great concern and we

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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 West River Cooperative Telephone as part of this process.

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 605-244-5213). We are also certainly willing to meet with anyone at the Commission on this matter, if that is desired.

Sincerely,

/s/ Jerry Reisenauer

Jerry Reisenauer
General Manager
West River Cooperative Telephone Company