

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
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 an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Line-Up)	WC Docket No. 03-109
)	
Universal Service Reform – Mobility Fund)	WT Docket No. 10-208

REQUEST FOR WITHDRAWAL OF PETITION FOR RECONSIDERATION

The Blooston Rural Carriers hereby request withdrawal of their *Petition for Partial Reconsideration*, timely filed on December 29, 2011, in the above-captioned proceeding.¹ The Blooston Rural Carriers filed the Petition seeking reconsideration of, among other things, the Commission’s decision to distribute Mobility Fund Phase I funds through a reverse-auction

¹ Petition for Partial Reconsideration of the Blooston Rural Carriers, *In the Matter of Connect America Fund, et al.*, WC Docket No. 10-90, et al., filed December 29, 2011 (“Petition”).

mechanism.² At this time, the Commission has not yet acted on the Petition, and the Phase I auction has progressed unabated; as it stands, the deadline for applications to participate will have passed a mere two days from today. The Blooston Rural Carriers have concluded that, aside from the auction issue, other aspects of the Phase I process will make widespread participation by small rural carriers unlikely. Since the Commission has expressed concern that the pendency of the Petition may slow the process of addressing the vital issues raised in the application for review of USF/ICC Order currently proceeding before the United States Court of Appeals for the Tenth Circuit,³ the Blooston Rural Carriers have determined that their interests and the interests of the rural telephone industry would be better served by withdrawing the Petition.

Meanwhile, the Blooston Rural Carriers will continue to pursue its concerns about reverse auctions and other issues related to the Mobility Fund, through its participation in proceedings relating to Phase II, which is supposed to be better geared toward small and rural carrier participation. The Blooston Rural Carriers have filed comments concerning the proposed Phase II rules.

² *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 a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link Up; Universal Service Reform – Mobility Fund*; Report and Order and Further Notice of Proposed Rulemaking, WC Dockets No. 10-90, 07-135, 05-337, 03-109; CC Dockets No. 01-92, 96-45; GN Docket No. 09-51; WT Docket No. 10-208, released November 18, 2011 at ¶322.

³ Respondent's Motion to Hold in Abeyance, In re: FCC 11-161, Docket No. 11-9900, Court of Appeals for the Tenth Circuit, filed June 25, 2012.

Respectfully submitted,

THE BLOOSTON RURAL CARRIERS

By /s/ John A. Prendergast
John A. Prendergast
Counsel to the Blooston Rural Carriers

Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street, NW (Suite 300)
Washington, DC 20037
Phone: (202) 659-0830
Facsimile: (202) 828-5568

Dated: July 9, 2012

Certificate of Service

I hereby certify that on July 9, 2012, a copy of the forgoing **Request for Withdrawal of Petition for Partial Reconsideration of the Blooston Rural Carriers** was served on each of the following via US Mail, postage prepaid:

Charles Acquard
Executive Director, NASUCA
8380 Colesville Road, Suite 101
Silver Spring, MD 20910

Stefanie A. Brand
Director, Division of Rate Counsel
P.O. Box 46005
Newark, NJ 07101

Christopher M. Miller
Verizon
1320 North Courthouse Road
9th Floor
Arlington, VA 22201-2909

Cathy Carpino
AT&T Services, Inc.
1120 20th Street, N.W.
Suite 1000
Washington, D.C. 20036

By : s/ Salvatore Taillefer, Jr.

Blooston, Mordkofsky, Dickens,
Duffy & Prendergast, LLP
2120 L Street, NW, Suite 300
Washington, DC 20037