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June 6, 2012

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VIA OVERNIGHT MAIL

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

Re: Petition for Waiver of Dell Telephone Cooperative, Inc.; *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 a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Lifeline and Link-Up*, WC Docket No. 03-109, *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208

Dear Ms. Dortch:

Enclosed for filing in the above-referenced dockets is the Petition for Waiver of Dell Telephone Cooperative (“Dell Telephone”). Dell Telephone seeks a waiver of the following three new universal service fund rules: (i) the \$250 per line monthly cap on High Cost Loop Support (“HCLS”);¹ (ii) the rule limiting reimbursable capital and operating expenses for HCLS;² and (iii) the updated and extended limits on recovery of corporate operations expenses applied to HCLS and Interstate Common Line Support (“ICLS”).³

¹ 47 C.F.R. § 54.302.

² *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 10-90, FCC 11-161, ¶ 220 (rel. Nov. 18, 2011) (“*USF Transformation Order*”); see also *Connect America Fund, High-Cost Universal Service Support*, WC Docket No. 10-90 & WC Docket No. 05-337, Order, DA 12-646 (rel. Apr. 25, 2012) (adopting methodology to limit reimbursable capital and operating expenses for HCLS) (“*HCLS Benchmark Methodology Order*”).

³ *USF Transformation Order* ¶¶ 227-33, 47 C.F.R. § 36.621(a)(4).

Marlene H. Dortch

June 6, 2012

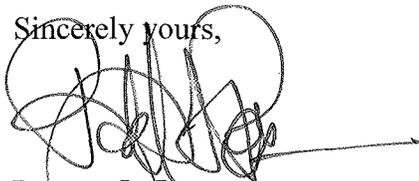
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As detailed in the enclosed Request for Confidential Treatment, Dell Telephone requests that the Commission treat as confidential parts of the petition and supporting exhibits that contain confidential and proprietary information. Accordingly, Dell Telephone submits two versions of the petition and supporting exhibits: (1) a non-redacted version that contains confidential and proprietary information; and (2) a redacted version for public inspection. Dell Telephone requests that the Commission treat the non-redacted version and the accompanying documents confidentially.

In addition, please find enclosed Dell Telephone's Form 159 for this filing, as well as the requisite filing fee.

Please contact the undersigned with any questions.

Sincerely yours,



Bennett L. Ross
Counsel for Dell Telephone Cooperative

BLR:rw

Enclosure

cc: Sharon Gillett
Carol Matthey