

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 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 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

COMMENTS OF BACA VALLEY TELEPHONE COMPANY INC.
ON DELL TELEPHONE COOPERATIVE'S PETITION FOR WAIVER

August 6, 2012



VALLEY TELEPHONE CO., INC.

532 BROADWAY AVENUE - P.O. BOX 67 - DES MOINES, NM 88418

Baca Valley Telephone Co., Inc. ("BVT"), submits these Comments in connection with Dell Telephone Cooperative's ("Dell Telephone") Petition for Waiver of certain high-cost universal service rules filed in this proceeding on June 6, 2012. BVT is a rural rate-of-return regulated local exchange carrier serving customers in a rural high cost area of New Mexico. As discussed below, BVT supports Dell Telephone's Petition.

It is evident from the Petition and supporting materials submitted by Dell Telephone that application of the new universal service rules to Dell Telephone will have severe and undesired impacts on the ability of the Cooperative to continue to serve its customers. Dell Telephone's particular circumstances – large, remote and rugged service area with extremely high service costs and low customer density – cause it to be highly exposed to extraordinarily harsh consequences from application of the Commission's new USF rules.

While BVT acknowledges that reform of the high cost fund is viewed by the Commission to be essential to preservation and advancement of universal service throughout the country, BVT also joins Dell Telephone in encouraging the Commission to grant relief from its USF rules in those limited circumstances, such as those now confronting Dell Telephone, where application of the rules would be actively detrimental to the goal of preservation and advancement of universal service. Dell Telephone's Petition sets forth a compelling showing of the need for relief from the Commission's rules. BVT fully supports Dell Telephone's Petition and urges the Commission to act promptly to grant the requested waiver.

Respectfully submitted,

BACA VALLEY TELEPHONE CO., INC.

By:


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