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September 13, 2012

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte
WC Docket Nos. 10-90, 07-135, 05-337, 03-109
CC Docket Nos. 01-92, 96-45
GN Docket No. 09-51

Dear Ms. Dortch:

On Tuesday, September 11, 2012, representatives of Central Texas Telephone Cooperative, Inc. (“Central Texas”) including Jamey Wigley, General Manager of Central Texas, Lawana Drosche, Finance Manager of Central Texas, Clay Sturgis of Moss Adams, Michael Romano of the National Telecommunications Cooperative Association (“NTCA”), and the undersigned, Kenneth Johnson of Bennet & Bennet, PLLC, met with Angela Kronenberg, Wireline Legal Advisor to Commissioner Mignon Clyburn of the Federal Communications Commission (“FCC” or “Commission”). Central Texas also met with Priscilla Argeris, Legal Advisor to Commissioner Jessica Rosenworcel.

In both meetings, Central Texas discussed its September 4, 2012, petition for waiver¹ of the Commission’s regression analysis benchmarking rule that limits reimbursable capital and operating expenses for High Cost Loop Support (“HCLS”). Central Texas also discussed the application for review that it filed on May 25, 2012.² Central Texas provided details about its service area. Specifically, Central Texas serves an extremely high-cost area that includes difficult terrain and has a low population density – factors that directly affect Central Texas’s loop and overall network costs.

Central Texas discussed its justifiable capital expenses (“capex”) and its efforts to keep its operating expenses (“opex”) low. Central Texas stated that the Commission should collapse

¹ *In re Petition for Waiver of Central Texas Telephone Cooperative, Inc.*, WC Docket Nos. 10-90, *et. al.*, (filed Sep. 4, 2012).

² *In re Central Texas Telephone Cooperative, Inc. Application for Review*, WC Docket Nos. 10-90, *et. al.*, (filed May 25, 2012).

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the opex and capex results into one overall loop cost output to be used in the regression model. This would encourage carriers to make prudent cost-cutting decisions based on their own individual circumstances, rather than making decisions based on capex and opex cap outcomes. Central Texas also discussed narrowly-tailored waiver relief that would cover years 2012 and 2013.

Should you have any questions or require additional information, please do not hesitate to contact me.

Respectfully submitted,

/s/ Kenneth C. Johnson

Kenneth C. Johnson

cc (via email): Angela Kronenberg
Priscilla Argeris