Wiley Rein LLP

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

Bennett Ross
202.719.7524
bross@wileyrein.com

October 9, 2012

VIA ECFS

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:

At its September 28, 2012 meeting with representatives of the Wireline Competition Bureau ("Bureau"), Dell Telephone Cooperative, Inc. ("Dell Telephone") was asked to provide additional information regarding its Petition for Waiver in the above-referenced proceedings. Specifically, the Bureau requested information about: (1) the OC-192 fiber transport facility operated by Dell Telephone; (2) Dell Telephone's access line and loop data; and (3) any bundled service offerings by Dell Telephone. This letter responds to the Bureau's requests.

I. DELL TELEPHONE'S OC-192 FIBER TRANSPORT FACILITY

Dell Telephone upgraded to an OC-192 fiber transport facility in 2006 in order to meet anticipated customer demand. Historically, traditional enterprise customers in Dell Telephone's service territory purchased only DS-1/DS-3 SONET service, which Dell Telephone was able to provide over its Nortel FMT 150 and OC-3 and OC-12 backbone network. However, beginning in 2004 and 2005, Dell Telephone received requests for high bandwidth, redundant services from customers such as Blue Origin (a space transport company owned by Amazon founder, Jeff Bezos), the Department of Homeland Security, the El Paso Electric Company, and the

Federal Aviation Administration – requests that Dell Telephone could not satisfy without making significant upgrades to its network.

In deciding on the nature of the network upgrades to make, Dell Telephone completed an extensive engineering plan and evaluated several transport alternatives. Ultimately, Dell Telephone concluded that an OC-192 architecture offered the most cost-effective, technologically-advanced solution that would be capable of satisfying anticipated increases in data traffic for years to come. This arrangement also provided Dell Telephone with long-term technical support from the vendor – support that it would not receive had it purchased a smaller capacity system available at the time that is no longer manufactured today.

Since deploying its OC-192 transport facility, Dell Telephone is able to offer additional capacity and redundancy that is essential to facilitating interconnection with other carriers, providing broadband Internet access services to its end users, and meeting the transport needs of its enterprise and wholesale customers. Current utilization of the facility is approximately [[redacted]].

II. ACCESS LINE AND LOOP DATA

The chart below presents Dell Telephone's access lines and loops for the past six years by study area:

Dell Telephone Access Lines and Total Loops (2006-2011)						
	Access Lines			USF Total Loops[1]		
Year	NM	TX	Total	NM	TX	Total
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

[1] "USF Total Loops" includes official company lines and special access lines, which are not reflected in "Access Lines," consistent with the instructions in the National Exchange Carrier Association's Loop Count Guide.

III. BUNDLED OFFERINGS

Dell Telephone does not provide video or wireless services and thus does not offer a so-called "triple play" or "quadruple play" to customers. Although Dell Telephone does provide voice and data services, it does not offer these services as part of a bundle (that is, a single offering by which the customer receives a discount for purchasing services together as compared to the price of the services on a standalone basis). Dell Telephone has not observed any customer demand for a voice and data bundled service offering.

Pursuant to 47 C.F.R. § 1.1206 of the Commission's rules, please include this ex parte filing in the above-referenced dockets.

Sincerely,

Bennett L. Ross

cc: Carol Mattey
Rebekah Goodheart
Trent Harkrader
Michael Jacobs
Katie King
Susan Miller
Gary Seigel
Joseph Sorres