

March 5, 2013

VIA ECFS

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

Re: WC Docket No. 08-71; SureWest Telephone Petition for Waiver

Dear Ms. Dortch:

SureWest Telephone (“SureWest”), through undersigned counsel, submits this letter in lieu of reply comments on its petition for waiver of the deadline required by Section 54.314(d)(1) and (d)(2) of the Commission’s Rules for filing a certification to receive high-cost universal service support.¹

On February 13, 2013, the California Public Utilities Commission submitted a certification to the Commission that SureWest is eligible to receive federal high-cost support for 2013 and should be added to the “List of California Certificated Carriers for Federal High-Cost Fund Support for 2013.”² In addition, comments on the Petition were due by March 4, and no comments opposing the waiver were filed. As described in the Petition, SureWest will not have the ability to receive Interstate Common Line Support (“ICLS”) for the first and second quarters of 2013 – approximately \$2.5 million – if the certification deadlines are strictly enforced and the requested waiver is denied. The loss of the ICLS funding will impair the ability of SureWest to invest in new and upgraded telecommunications infrastructure in California. SureWest therefore urges the Commission to act promptly to grant its waiver request and direct the Universal Service Administrative Company to provide ICLS funding to SureWest for the first and second quarters of 2013.

Respectfully submitted,

/s/

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¹ See *Wireline Competition Bureau Seeks Comment on the SureWest Telephone Petition for Waiver of a High-Cost Universal Service Filing Deadline*, Public Notice, DA 13-139, WC Docket No. 08-71 (rel. Feb. 1, 2013).

² See Letter from Paul Clanon, Executive Director, CPUC, to Marlene Dortch and Karen Majcher, CC Docket NO. 96-45 and WC Docket No. 10-90 (dated Feb. 13, 2013). A/75410549.1