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**Via ECFS**

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

**Re: WC Docket Nos. 10-90 and 05-337**

Dear Ms. Dortch:

On Monday, April 8, 2013, representatives of Central Texas Telephone Cooperative, Inc. (“Central Texas”), including Kenneth Johnson and Michael Bennet of Bennet & Bennet, PLLC, Jamey Wigley, General Manager of Central Texas, Lawana Drosche, Finance Manager for Central Texas, and Derrick Owens of the Western Telecommunications Alliance, met with Federal Communications Commission (“FCC” or “Commission”) Commissioner Mignon Clyburn and her Wireline Legal Advisor Angela Kronenberg to discuss the status of Central Texas’s Petition for Waiver<sup>1</sup> and Application for Review<sup>2</sup> of the FCC’s universal service rules in light of the Sixth Order on Reconsideration.<sup>3</sup> Central Texas praised Commissioner Mignon’s office and the Wireless Telecommunications Bureau (“Bureau”) for its transparent and consistent handling of the quantile regression analysis process.

Central Texas discussed the impact of the FCC’s decision in the Sixth Order to sum the opex and capex caps and suggested a similar summing of opex and capex caps for 2014 and beyond. Central Texas expressed the need for a stable and static regression analysis model as the Bureau moves forward pursuant to the Sixth Order. Stability for three to five years with advanced notice of future changes will allow managers to plan accordingly. Central Texas noted the need for the Bureau to move quickly on changes to the regression analysis model for 2014 and beyond in order to allow industry input in the process. Central Texas commented that any changes to the regression analysis model should take into account the tremendous scope and vast

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

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

<sup>3</sup> *In re Connect America Fund*, WC Docket Nos. 10-90, *et. al.*, Sixth Order on Reconsideration and Memorandum Opinion and Order, FCC 13-16 (February 27, 2013) (“Sixth Order”).

areas encountered by many rural telecommunications providers. For example, more road miles should generally reflect higher costs. Central Texas also discussed the Texas universal service fund recovery process and the need for a timely FCC decision on its pending request for waiver. Central Texas reasoned that the same rationale in the Sixth Order that persuaded the Commission to sum capex and opex for the remainder of 2013 should also apply to 2012 and the first three months of 2013 for Central Texas.

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

Respectfully submitted,

*/s/ Kenneth C. Johnson*

Kenneth C. Johnson

cc: The Honorable Mignon Clyburn  
Angela Kronenberg  
Erin Boone  
Derrick Owens