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Pamela J. Patton, Commissioner
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The Honorable Mignon Clyburn
Acting Chairwoman
Federal Communications Commission

14 June, 2013

The Honorable Ajit Pai
Commissioner
Federal Communications Commission

The Honorable Jessica Rosenworcel
Commissioner
Federal Communications Commission

445 12th Street, SW
Washington, DC 20554

Re: Written Ex Parte - In the Matter of the Petition for Waiver of South Park, L.L.C. (dba South Park Telephone Company), WC Docket No. 10-90, et al.

On November 27, 2012 South Park Telephone Company, Inc., ("SPT") filed a petition requesting a waiver of the $250 per-line monthly cap and High Cost Loop Support limitations established in the November 2011 USF/ICC Transformation Order. While a sparse population and geography poses challenges and high costs in the deployment and operation of communications systems in many parts of Colorado, the SPT serving area is particularly uniquely situated in terms of its size (603 sq. mi.) and mountainous geography. We appreciate your diligence in evaluating the petition and consideration of the waiver request, and believe that SPT is exactly the type of rural carrier that Universal Service funding was designed to support.

Sufficient funding through the USF is critical to both the current voice communications needs of the citizens of South Park but also to its ability to attain broadband service and sustain its economy. SPT currently charges its customers the highest phone rates in the state at $29.98 for a residential line and $39.98 for a business line and reduced funding will certainly drive rates upward. Additionally, in a recent audit performed by the Colorado PUC staff, data indicated that there were no alternative providers offering service across the SPT serving area.

It is our understanding that the Commission has granted USF waivers to both Accipiter and Allband in the past where similar deployment challenges and high costs existed. We are mindful of the Commission's desire to reduce the USF fund size and to transition funding in support of broadband, but hope that the Commission reaches the same conclusion after a full review of its petition and supporting materials filed by SPT.

Finally, we understand that numerous letters of support have been submitted from the local fire department, public library, the Board of County Commissioners, the South Park Chamber of Commerce, as well as several local businesses. Clearly SPT is a valuable member of the Park County Community and is making a positive impact on the local economy. Your continued supported of their efforts is greatly appreciated.

Per Commission regulations a copy of this letter is being filed as a written ex parte in WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109 and WT Docket No. 10-208.

Sincerely,

Joshua Epel
Chairman, Colorado Public Utilities Commission

James Tarpey
Commissioner, Colorado Public Utilities Commission

Pam Patton
Commissioner, Colorado Public Utilities Commission

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