



ACCEPTED/FILED

JUN 19 2013

Federal Communications Commission
Office of the Secretary

April 3, 2013

EX PARTE OR LATE FILED

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
Attention: Lorenzo Miller, 202-418-0846 or John Emmett, 202-418-0386
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: In the Matter of the Connect America Fund, WC Docket No. 10-90; High-Cost Universal Service Support, WC Docket No. 05-337; Expedited Waiver Request and Study Area Boundary Submission for South Slope Cooperative Telephone Company, Study Area 351298

Dear Ms. Dortch:

Pursuant to telephonic ex parte discussions with Wireline Competition Bureau staff on March 12, 2013 (ex parte filing attached), this Expedited Waiver request is made on behalf of South Slope Cooperative Telephone Company ("South Slope"), Study Area 351298.

South Slope requests an expedited waiver herein, pursuant to 47 C.F.R. §1.3, to correct erroneous study area boundary data used by the Federal Communications Commission ("Commission") for the purpose of establishing certain independent variables used in the Quantile Regression Analysis ("QRA") for limiting capital and operations expenses in the high cost loop support algorithm.

South Slope has uncovered inaccuracies in the Commission's data or methodology for removal of the Amana exchange from the South Slope study area boundary. The Amana exchange was acquired from another Rate of Return carrier, and South Slope is not eligible to receive high cost loop support as ordered by the Commission.¹ Thus, the exchange boundary for the Amana exchange must be removed from the South Slope study area boundary for purposes of QRA calculations.

Good cause exists for the Commission to grant this waiver request due to the impact that inaccurate independent variables will have on South Slope's high cost loop support calculations.

¹ Joint Petition for Waiver of the Definition of "Study Area" contained in Part 36 Appendix-Glossary of the Commission's Rules and Definition of "Average Schedule Company" in Section 69.605(c) of the Commission's Rules, CC Docket No. 96-45, Order, DA 01-1327, released June 6, 2001, at para 7.

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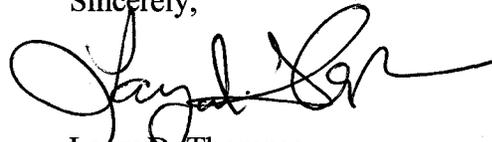
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March 12, 2013
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South Slope requests expedited treatment of this waiver to correct the study boundary information and associated independent variables the Commission has on file in the HCLS Benchmarks Implementation Order. South Slope further requests the Commission apply these corrections effective July 1, 2012 to ensure the 90th percentile caps are accurately reflected for 2012 and 2013².

In accordance with the specifications set forth in Appendix C of the HCLS Benchmarks Implementation Order, enclosed please find a CD containing: 1) Shape File, and 2) Readme File (including contact information and a certification statement from a company officer). This information meets all the requirements for the Specification for Study Area Boundary Submission.

If you have any questions, please do not hesitate to contact me at (605) 995-1777 or Larry.Thompson@Vantagepnt.com.

Sincerely,



Larry D. Thompson
Chief Executive Officer
Vantage Point Solutions

cc w/o enclosures:
Michael Romano, NTCA
Justyn Miller, South Slope
Joseph Cavender, FCC
Travis Litman, FCC
Craig Stroup, FCC
James Eisner, FCC

Enclosures: Ex parte of March 12, 2013 filed on March 13, 2013
CD Rom containing Shapefiles and Readme files

² *Connect America Fund, High-Cost Universal Service Support*, WC Docket Nos. 10-90, 05-337, Order, DA 12-646, released April 25, 2012 (*HCLS Benchmarks Implementation Order*) at paras 27-29.



March 13, 2013

Ex Parte Notice

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

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 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109

Dear Ms. Dortch:

On Tuesday, March 12, 2013, Justyn Miller and Carla Miner of South Slope Cooperative Communications (South Slope), Larry Thompson, Quentin Flippin, and Jolyn Doering of Vantage Point Solutions, along with Michael Romano of the National Telecommunications Cooperative Association, had a conference call with Joseph Cavender, Travis Litman, Craig Stroup, and James Eisner of the Wireline Competition Bureau.

During the conference call, we discussed South Slope's specific inputs to the FCC's Quantile Regression Analysis (QRA). Vantage Point discussed how the cap determined by the QRA was sensitive to the company's density (housing units divided by square miles). The input to South Slope's QRA is 402.8672 housing units per square mile, which can be found in the "density" column of the FCC's "RegInput2012_04_25.xls" database. Vantage Point explained that this value appears to be a factor of 10 too high when South Slope's actual number of housing units and area are used. A density of 402.8672 is also not consistent with the density calculated using the housing units and area found in the FCC's database (Input.xls) from the FCC's first QRA. The FCC's initial database showed 13,379 housing units and 318 square miles which results in a density of approximately 42 housing units per square mile, not 402.8672 housing units per square mile. South Slope believes the actual density to be approximately 42 housing units per square mile.

The parties discussed how areas that are subject to the "Parent Trap Rule" may be in turn affected within the QRA even if they are not otherwise affected by the rule for purposes of USF support. Vantage Point stated that removal of the Amana exchange (which was acquired from another small Rate of Return carrier) from the South Slope study area for purposes of QRA

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calculations may result in a slight increase in the study area density, but it would certainly not increase the density from 42 to over 400 housing units per square mile. The parties discussed how South Slope might present information and otherwise seek to have this data point corrected within the model.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (605) 995-1777 or Larry.Thompson@Vantagepnt.com.

Sincerely,

/s/ Larry D. Thompson

Larry D. Thompson
Chief Executive Officer
Vantage Point Solutions

cc:

Michael Romano, NTCA
Justyn Miller, South Slope
Joseph Cavender, FCC
Travis Litman, FCC
Craig Stroup, FCC
James Eisner, FCC