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August 21, 2013

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

**Re: Notice of *Ex Parte* Presentation in WC Docket Nos. 10-90 and 05-337
Application for Review of Silver Star Telephone Company, Inc.**

Dear Ms. Dortch:

On August 19, 2013, Silver Star Telephone Company, Inc. (Silver Star) met with Nicholas Degani, Legal Advisor to Commissioner Pai to discuss its pending Application for Review of the Wireline Competition Bureau's Order denying, in part, its request for waiver to correct data in the quantile regression analysis model. Allen Hoopes, Chairman and Chief Executive Officer, Ron McCue, President and Chief Operating Officer, and Jeff England, Vice President and Chief Financial Officer of Silver Star, along with Wendy Moris of TCA and the undersigned attended the meeting for Silver Star.

In the meeting, we provided the attached document for discussion. The document includes aerial photos showing a sample of the many existing roads in Silver Star's Idaho and Wyoming study areas that are not included in ESRI version 10.0. Silver Star explained that many of these roads are associated with housing subdivisions that were constructed between the years 2000 and 2010. Silver Star also explained that it has constructed facilities to all of these housing subdivisions. Silver Star stated that ESRI version 10.1 still is not accurate for its study areas.

We also discussed the fact that grant of the waiver would not have a direct financial impact on Silver Star for 2012, 2013 or 2014 because of the recent order limiting the financial impact of the regression model to 15% of a company's universal service funding. However, it is important to correct the data because it shapes Silver Star's capital budgeting and it could have a financial impact on Silver Star in the future.

In addition, it is important to use correct data when evaluating any changes to the model on a going forward basis, and for the legitimacy of the model and the modeling process. Good public policy must be based on accurate factual data. In the case of Silver Star, the ESRI road data used in the regression model is in many cases nearly 40% incorrect. Good public policy, the principle of fair dealing and the integrity of the process, require that this data be corrected.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Mary J. Sisak

Attachment
cc: Nicholas Degani