VIA ECFS

August 21, 2013

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

Re: Ex Parte Letter
Rate of Return Represcription
WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51;
CC Docket Nos. 96-45 and 01-92; WT Docket No. 10-208

Dear Ms. Dortch:

Please find enclosed the ex parte letter of Mid-Plains Rural Telephone Cooperative submitted in the proceeding initiated by the Commission to represcribe the authorized rate of return.[1]

Thank you.

Respectfully submitted,

Rick Hurt

Rick Hurt
General Manager
Mid-Plains Rural Telephone Coop., Inc.

[1] *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17870, para. 640 (2011) (*USF/ICC Transformation Order and Further Notice*), *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011).

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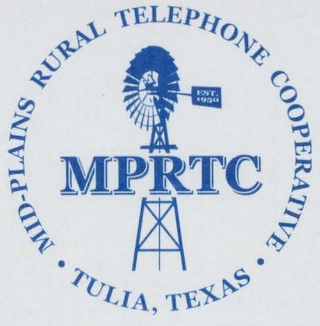
MID-PLAINS RURAL TELEPHONE COOPERATIVE
MPRTC
TULIA, TEXAS



July 16, 2013

Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Commissioners,

We are presenting this letter in response to the recent notification that the FCC is considering the reduction of the current 11.25 percentage factor of the "High Cost Loop Support" (HCLS).

The long term stability of the HCLS is extremely important to meeting the financial responsibilities of not only daily operations and maintenance, but is critical in fulfilling long term obligations related to debt.

Mid-Plains Rural Telephone Cooperative, Inc. has invested heavily in outside plant "Fiber to the Home" (FTTH) projects over the last five years, made possible by borrowing funding from RUS.

Mid-Plains secured a 30 year RUS loan in 2009 in the amount of $20,221,000.00. This loan allowed Mid-Plains to build FTTH in many critical areas where the old copper facilities had started to fail. In other locations we were able to install FTTH to keep pace with growth in developing areas. Older legacy equipment has been updated to concentrators. A new central office was built, and equipped with the latest soft-switching equipment in order to offer state of the art technology throughout the serving area. In order to complete the build-out in underserved areas, an additional loan of $2,590,000.00 was secured from RUS, and this phase is nearing completion as well.

Mid-Plains also elected to secure an RUS BIP loan/grant in the amount of $2,809,000.00 which has further extended the fiber network and services to many rural and remote areas of the territory we serve. This project is also nearing completion, and we will soon be able to offer high quality voice and greater broadband speeds to areas that had been underserved in the past.

We currently have fiber connections to 60% of our subscribers, and the capability of providing broadband data services to 99% of the customers in a serving area that covers over 3000 square miles of the Texas Panhandle region.

Obviously, Mid-Plains has been proactive in improving and expanding services for a number of years and is well ahead of the curve as related to the new FCC ETC 5 year plan. While we are

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constantly striving to continue upgrading the remaining areas of the network, it has become a huge challenge financially, especially when you factor the RUS loan payments into the equation.

Continued stable financial support is critical; without adequate support, the doors to Mid-Plains would close quickly. If that were to happen, this rural area would be devastated not only in the technological sense, but the area's economy would suffer tremendously. Agriculture and cattle feeding operations rely on Mid-Plains to keep them connected to the world markets. We provide services to schools, medical clinics, fire departments, government offices and professionals from all walks of life.

As directors and officers of Mid-Plains we strongly recommend that the commission reconsider any action resulting in the reduction of the HCLS funding, that not only Mid-Plains but hundreds of other telecom providers depend on now and in the future.

Sincerely,

Board President, Mikeal Barnes, Mikeal Barnes

Vice - President, Jeremy Reed,

Secretary, Ronnie Middleton,

Director, Mike Kuhlman,

Director, Randy Fellers,

Director, Lee Moore,

Director, Ronnie Johnson, Ronnie Johnson

Director, Elton Cantwell, Elton Cantwell

Director, Emery Goodin,

General Manager, Rick Hurt

Asst. Manager, LaTonda Stout LaTonda Stout