



By ECFS

January 8, 2014

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

Attention: Chief, Wireline Telecommunications Bureau

**Re: WC Docket No. 08-71
Madison Telephone Company Petition for Waiver of Sections 54.305(d)(2),
54.305(f), and 36.612(a)(2) to Receive Safety Valve Support
Written *Ex Parte* Communication**

Dear Ms. Dortch:

Madison Telephone Company (“Madison or “Company”) hereby files this written *ex parte* notice to serve as an update to its September 26, 2013 Petition for Waiver of Sections 54.305(d)(2), 54.305(f), and 36.612(a)(2) to Receive Safety Valve Support (“SVS”) (“Petition”). As detailed in the Petition, immediately after acquiring two exchanges in 2001, Madison took extensive measures to familiarize itself with the rules and repeatedly sought guidance from the National Exchange Carriers Association (“NECA”) and the Universal Service Administrative Company (“USAC”) as to whether quarterly or annual High Cost Loop Fund filings were required to begin receiving SVS.

Madison received confusing guidance, but continued to diligently pursue clarification and submit information it believed to be correct. To further complicate matters, as presented in the aforementioned waiver filing, at one point the Company was the recipient of SVS recovery as a result of its annual cost study data submission. Without proper notification or further clarification, that receipt of SVS funding was subsequently credited (removed) during the settlement process without specific reference to SVS.

Upon undertaking a comprehensive review of its overall budget in preparation for the five-year plan filing required by the FCC (as a result of the current *USF/ICC Transformation Order*) Madison discovered that, in fact, it had not received SVS. Madison then filed the Petition in which it requested that, if granted, the Commission permit Madison to submit quarterly data for the previous years that the company should have been receiving SVS, *or alternatively*, resubmit its SVS eligibility and election notification pursuant to Section 54.305(f) and establish a calendar index year of January 1 – December 31, 2002. Under either option, Madison would be allowed to align its index year with the appropriate data and receive the SVS it should have received.

In anticipation of potential grant of the Petition, Madison informs the Commission that it has submitted the 2013-3 data to NECA on December 26, 2013. Furthermore, if such relief is so ordered by the FCC by granting the Petition that allows the Company to resubmit its SVS eligibility and election notification, no additional filing of data would be necessary because the Company has historically and timely filed its annual cost study data each year. As indicated in the filing, and as an alternative, Madison stands ready to prepare and submit "-3" quarterly reports for all previous years since the acquisition of the exchanges if the Commission grants Madison's Petition and requires Madison to file "-3" reports in order to receive SVS.

Please contact the undersigned with any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert W. Schwartz", written over a horizontal line.

Robert W. Schwartz
President
Madison Telephone Company
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P.O. Box 29
Staunton, IL 62088
618-635-1000

Cc: Chin Yoo
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