



REDACTED – FOR PUBLIC INSPECTION

Ex Parte Notice

February 12, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *Connect America Fund, WC Docket No. 10-90 and
High-Cost Universal Service Support, WC Docket No. 05-337***

Dear Ms. Dortch:

On February 10, 2014, Dan Caldwell of Consortia Consulting (Consortia) and the undersigned met with Suzanne Yelen, Katie King, Ian Forbes, and Alexander Minard of the Commission. Rod Bowar of Kennebec Telephone Company, Inc. (Kennebec) and Jessica Meyer of Consortia joined the meeting via telephone.

The purpose of the meeting was to discuss and provide additional information relating to the *Petition for Waiver of the Application of the Commission's January 15, 2014, Order* (Petition) filed by Kennebec in the above-captioned dockets on January 28, 2014. As set forth in the Petition, Kennebec incurred substantial expenses in 2012 preparing and filing an expedited waiver in order to correct erroneous data relied upon by the Wireline Competition Bureau (Bureau) for that year's high-cost support benchmarks. These incurred expenses caused Kennebec to subsequently exceed the high-cost support benchmark in 2014 by \$5.17 per line. As described in the Petition, had Kennebec not incurred those waiver-related expenses, its expenses would have remained beneath the 2014 cap.

At the meeting, Kennebec described with specificity the various expenses it incurred in preparing the 2012 expedited waiver, and shared an electronic version of vendor invoices to support the discussion.

Hard copies of those invoices are submitted herewith via hand-delivery with an express request for confidential treatment of those materials. Each page of the confidential, non-redacted submission is marked "Proprietary and Confidential." A redacted copy of those invoices is filed herewith for the public record, while the confidential version is provided under seal. Confidential treatment is requested as disclosure could cause substantial competitive harm because other competitive entities could assess aspects of the companies' operations and could, in turn, use that

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information to undermine their business plans. Providing others with insight into the companies' operations would cause substantial harm as the data and information provided could be used to undermine their competitive positions. There is also a concern that public disclosure might encourage other parties to circumvent Commission rules or hamper an investigation.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter, along with the redacted materials, is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at 703-351-2035 or at jseidemann@ntca.org.

Submitted respectfully,

s/Joshua Seidemann
Joshua Seidemann
Director of Policy

Attachments

cc: Suzanne Yelen
Katie King
Ian Forbes
Alexander Minard



Invoice

16924 Frances Street, Suite 115
Omaha, NE 68130

Date	Invoice #
4/30/2012	12854

Bill To
Kennebec Telephone Company Rod Bowar P.O. Box 158 Kennebec, SD 57544-0158

Item	Description	Qty	Rate	Amount
Contract - Kennebec	Contract includes all services associated with interstate cost study and general consulting support.			
General Support NECA Data Request FCC Ex-parte PVU Issues Billing Dispute FCC Ord ICC/USF Reform 11/16/11 NECA Reporting ICLS Certification FCC Waiver USF Prog Support-Lifeline Regulatory Support - Federal CPR-Continuing Property Records Budget/Forecast Analysis	Order Impact Analysis			
Total Current Hours Total Previous Hours Total Hours to Date				
Total Contracted Hours Total Remaining Hours				
	BOOKINGS			

Services for period March 1 - March 31, 2012	Subtotal	
	Sales Tax (6.0%)	
	Total	

Phone #
402-398-0062



Invoice

16924 Frances Street, Suite 115
Omaha, NE 68130

Date	Invoice #
5/23/2012	12953

Bill To
Kennebec Telephone Company Rod Bowar P.O. Box 158 Kennebec, SD 57544-0158

Item	Description	Qty	Rate	Amount
Contract - Kennebec	Contract includes all services associated with interstate cost study and general consulting support.			
FCC Ord ICC/USF Reform 11/16/11				
FCC Waiver				
USF Prog Support-Lifeline				
General Support				
Billing Dispute				
Pay Phone Comp. Report				
Transitional Access Rte Analys				
CPR-Continuing Property Records				
NECA Data Collectn for CAF ICC				
Budget/Forecast Analysis				
NECA Reporting				
Total Current Hours				
Total Previous Hours				
Total Hours to Date				
Total Contracted Hours				
Total Remaining Hours				
Expense	Copies of Presentation for meeting with Governor staff			
Expense	FCC Handouts			
	BOOKINGS			
Services for period April 1 - April 30, 2012		Subtotal		
		Sales Tax		
		Total		

Phone #
402-398-0062

Sales Tax	
Total	



Invoice

16924 Frances Street, Suite 115
Omaha, NE 68130

Date	Invoice #
6/22/2012	13061

Bill To
Kennebec Telephone Company Rod Bowar P.O. Box 158 Kennebec, SD 57544-0158

Item	Description	Qty	Rate	Amount
Contract - Kennebec	Contract includes all services associated with interstate cost study & general consulting support.			
FCC Waiver State Cert. of Fed. USF USF Prog Support-Lifeline General Support NECA Data Collectn for CAF ICC CPR-Continuing Property Records USF Prog Support-Schools & Libr FCC Ord ICC/USF Reform 11/16/11 NECA Reporting Regulatory Compliance	FCC Order 11/16/11			
Total Current Hours Total Previous Hours Total Hours to Date				
Total Contracted Hours Total Remaining Hours Total Additional Hours	BOOKINGS Intrastate Interstate Other			

Services for period May 1 - May 31, 2012	Subtotal
	Sales Tax (6.0%)
	Total

Phone #
402-398-0062



16924 Frances Street, Suite 115
Omaha, NE 68130

Invoice

Date	Invoice #
7/24/2012	13154

Bill To
Kennebec Telephone Company Rod Bowar P.O. Box 158 Kennebec, SD 57544-0158

Item	Description	Qty	Rate	Amount
Contract - Kennebec	Contract includes all services associated with interstate cost study general consulting support			
USF Prog Support-Lifeline				
Regulatory Support - Federal				
FCC Waiver				
Interconnection Contracts				
Budget/Forecast Analysis				
General Support				
NECA Reporting				
FCC Ord ICC/USF Reform 11/16/11				
Pay Phone Comp. Report				
Total Current Hours				
Total Previous Hours				
Total Hours to Date				
Total Contracted Hours				
Total Remaining Hours				
Total Additional Hours				
Total Previous Hours Billed				
Total Billable Hours				
Expense	Share of airfare for D. Caldwell			
Expense	Copies for FCC meeting			
Expense	Share of meal expenses for Washington D.C. trip			
Expense	Share of Lodging expense for D. Caldwell			
Services for period June 1 - June 30, 2012		Subtotal		
		Sales Tax (6.0%)		
		Total		

Phone #
402-398-0062



Invoice

Date: 5/31/2012
 Invoice #: 50669

Bill To

Kennebec Telephone Company
 PO Box 158
 Kennebec, SD 57544

Contract/Work Order: Non-Contract

Project:

Work Code: A1.0 - [GC] General Consulting

Date	Staff Member	Work Description	Qty (hrs.)	Rate	Amount
5/7/2012	Quentin Flippin	FCC Mapping Coordination			
5/8/2012	Kris Scheetz	FCC Study Map Work			
5/8/2012	Quentin Flippin	FCC Mapping Coordination			
5/9/2012	Kris Scheetz	FCC Study Map Work			
5/9/2012	Quentin Flippin	FCC Mapping Coordination			
5/11/2012	Kris Scheetz	FCC Study Map Work			
5/14/2012	Kris Scheetz	FCC Study Map Work			
5/15/2012	Kris Scheetz	FCC Study Map Work			
5/15/2012	Lyle Zoerb	FCC Boundary Study			
5/15/2012	Kristi Cavanaugh	Kennebec Info for Data Request			
5/16/2012	Kris Scheetz	FCC Study Map Work			
5/16/2012	Kris Scheetz	FCC Study Map Work			
5/17/2012	Kris Scheetz	FCC Study Map Work			
5/17/2012	Kris Scheetz	FCC Study Map Work			
5/18/2012	Kris Scheetz	FCC Study Map Work			
5/18/2012	Kris Scheetz	FCC Study Map Work			
5/21/2012	Kris Scheetz	FCC Study Map Work			
5/22/2012	Kris Scheetz	FCC Study Map Work			



Terms: Net 30

Subtotal

Sales Tax (6.0%)

Total



Our team at Vantage Point appreciates your business!

Please direct any billing questions to Stephanie Nemeec at (605) 995-1791 or send e-mail to stephanie.nemeec@vantagepnt.com.

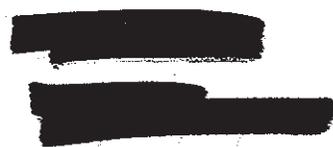


Invoice

Date: 5/31/2012
 Invoice #: 50668

Bill To

Kennebec Communications LLC
 PO Box 158
 Kennebec, SD 57544



Contract/Work Order: Non-Contract

Project:

Work Code: A1.0 - [GC] General Consulting

Date	Staff Member	Work Description	Qty (hrs.)	Rate	Amount
5/15/2012	Quentin Flippin	FCC Exchange Boundary Coordination and Data Collection			



Terms: Net 30

Subtotal



Sales Tax (6.0%)



Total



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Please direct any billing questions to Stephanie Nemeec at (605) 995-1791 or send e-mail to stephanie.nemeec@vantagepnt.com.

