



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.			

[The following text is extremely faint and largely illegible due to low contrast and scan quality. It appears to be a list of items or a detailed description of the contract services.]

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

Description	Qty	Rate	Amount
includes all services associated with interstate cost study and general consulting support.			

Item	
Contract - Kennebec	Contract i
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
Total Current Hours	
Total Previous Hours	
Total Hours to Date	
Total Contracted Hours	
Total Remaining Hours	
Total Additional Hours	

Subtotal	
Sales Tax (6.0%)	
Total	

Services for period May 1 - May 31, 2012

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			



FCC Study Map Work
 FCC Study Map Work
 FCC Study Map Work
 FCC Study Map Work
 FCC Study Map Work

5/18/2012 Kris Scheetz
 5/18/2012 Kris Scheetz
 5/18/2012 Kris Scheetz
 5/21/2012 Kris Scheetz
 5/22/2012 Kris Scheetz



Subtotal [redacted]
 Sales Tax (6.0%) [redacted]
 Total [redacted]

Terms: Net 30

your business!

Our team at Vantage Point appreciates

Stephanie Nemecek at (605) 995-1791 or step@vantagepoint.com.

Please direct any billing questions to Stephanie Nemecek and send e-mail to stephanie.nemecek@vantagepoint.com.



Invoice

Date: 5/31/2012
 Invoice #: 50668

Bill To
 Kennebec Communications LLC



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 [Redacted]
Sales Tax (6.0%) [Redacted]
Total [Redacted]

Our team at Vantage Point appreciates your business!

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

