



Your business
is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

VIA ECFS

February 12, 2014

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

**Re: WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135,
WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45
WC Docket No. 03-109, WT Docket No. 10-208, WC Docket 12-233
Notice of *Ex Parte* Presentation**

Dear Ms. Dortch:

On February 11, 2014, Todd Crandall of West Kentucky and Tennessee Telecommunications Cooperative (“WK&T”), and John Kuykendall and Steve Meltzer of JSI (collectively, “WK&T representatives”) met with Christi Barnhart of Commissioner Rosenworcel’s office. On February 12, 2014, WK&T representatives met separately with Amy Bender of Commissioner O’Rielly’s office, with Nicholas Degani of Commissioner Pai’s office and with Kalpak Gude, Victoria Goldberg, Douglas Sloten, Thomas Parisi and Gregory Haledjian (via telephone conference) of the Wireline Competition Bureau. Daniel Alvarez of Chairman Wheeler’s office also joined the Bureau meeting. The subject of discussion was the WK&T Petition for Limited Waiver of the Commission’s intercarrier compensation revenue recovery rules, specifically the 2011 Rate-of-Return Carrier Base Period Revenue.¹

Meeting participants discussed the timing of action on the WK&T Petition. The WK&T representatives urged the FCC to act expeditiously to grant the request for waiver prior to the 2013 Annual Access Tariff Filing, or allow for inclusion of the requested revenue amount in the FY 2011 base period as of July 1, 2013 if action is taken after the 2013 Annual Access Tariff Filing.

¹ See Amended Petition of West Kentucky and Tennessee Telecommunications Cooperative Petition for Limited Waiver of 47 C.F.R. § 51.917(b)(ii), WC Docket No. 10-90 *et al.*, filed May 23, 2013 (“WK&T Petition”).

February 12, 2014

Page Two

Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "John Kuykendall".

John Kuykendall
Vice President

cc: Christi Barnhart
Amy Bender
Nicholas Degani
Kalpak Gude
Victoria Goldberg
Douglas Sloten
Thomas Parisi
Gregory Haledjian
Daniel Alvarez