

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of)	
)	
Universal Service Contribution Methodology)	WC Docket No. 06-122
)	
Petition for Declaratory Ruling by the Rural Independent Competitive Alliance)	-
)	
Petition for Limited Waiver and Request for Review of a Decision of the Universal Service Administrator of ComSouth Telenet)	

REPLY COMMENTS OF COMSOUTH TELENET

In accordance with the Wireline Competition Bureau’s Public Notice DA 14-802, released June 10, 2012, ComSouth Telenet (“ComSouth”) files these reply comments with respect to its request for a limited waiver of a condition in the Declaratory Ruling and Order (“Order”) in this proceeding released November 25, 2013, DA 13-2254, 28 FCC Rcd 16037. ComSouth further requested review of a decision of the Universal Service Administrator denying ComSouth the relief established in the Order.

To the best of ComSouth’s knowledge, no comments have been filed with respect to its Petition and Request. ComSouth therefore requests that the Bureau proceed promptly to grant its requests on the basis of the uncontested information set forth in its pleading. ComSouth made substantial contribution payments to USAC under protest beginning in May 2011. The Order determined almost eight months ago that those contributions were not required and refunds have presumably been made to other parties similarly situated. ComSouth’s requests explained that

basis for its exclusion by the condition in the Order was neither relevant nor material and that it should also be entitled to refund of the excess contributions.

For the reasons stated above, ComSouth requests that under these specific unique circumstances, the Commission waive any RICA membership requirement in the Order and grant its Request for Review by directing USAC to process ComSouth's refund application.

Respectfully submitted

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