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Via ECFS

July 28, 2014

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

Re: WC Docket No. 08-71

Dear Ms. Dortch:

On July 24, 2014, Kim Harber and Mary Westerhold of Madison Telephone Company (“Madison”) or the (“Company”), and John Kuykendall, Cassandra Heyne and Ryan Denzel of JSI met via telephone with Suzanne Yelen, Alex Minard and Chris Cook of the Wireline Competition Bureau and Daniel Alvarez, Legal Advisor to Chairman Tom Wheeler. The subject of discussion was the Madison Petition for Waiver of Sections 54.305 and 36.612 rules in which the Company seeks to receive Safety Valve Support (“SVS”) for acquisition of two exchanges in 2001.¹

Attached is a summary of the talking points that were discussed on the call.

Please contact the undersigned with any questions.

Respectfully submitted,

John Kuykendall
Vice President

Attachment

¹ See Petition of Madison Telephone Company for Waiver of 47 C.F.R. § 54.305(d)(2), 54.305(f), and 36.612(a)(2) to Receive Safety Valve Support, WC Docket No. 08-71, filed Nov. 7, 2013 (“Madison Petition”).

cc: Suzanne Yelen
Alex Minard
Chris Cook
Daniel Alvarez



**Madison Telephone Company
Safety Valve Support Waiver
Ex Parte Presentation – Wireline Competition Bureau
July 24, 2014**

Call Agenda

- Review of Madison’s petition for waiver and request to be permitted to resubmit its Safety Valve Support (“SVS”) eligibility and election notice and establish a calendar index year of Jan. 1 – Dec. 31, 2002 to align the index year with the data that has already been submitted.
 - Madison seeks to receive the total amount of SVS for the investments it already made and that it should have received since it became eligible.
- On April 8, Madison provided the Wireline Competition Bureau with additional supporting documentation for the SVS calculations included in the waiver petition. This information was requested in Madison’s previous *ex parte* meeting with Bureau staff.
- During meetings with Commission staff, the issue was raised about the possibility of “me too” waivers if Madison’s petition were to be granted.
 - Madison and JSI subsequently conducted further research on the current SVS recipients and eligible companies.
 - Including Madison, there are 23 study areas eligible for SVS—16 of them either receive SVS or have received SVS in the past. Of the remaining 7 companies, our research confirmed that 3 filed the appropriate data, and 1 is Madison.
 - This leaves *at most* 3 other companies that could potentially file “me too” waivers, assuming they are in a similar situation as Madison.
- Granting Madison’s waiver will have a minimal budgetary impact on the USF. The FCC recently reinstated Safety Net Additive for companies that qualified based on significant network investment and implemented a streamlined procedure for

companies to receive their past support in a lump sum. Madison suggests that a similar procedure should be permitted in this case.

- Going forward, Madison is committed to working closely with the Wireline Bureau to provide any information that is requested in order to expeditiously resolve Madison's petition for waiver.
 - Madison respectfully requests a timeframe for an expected decision.
 - Madison is continually budgeting and developing network improvement plans where the SVS that Madison is eligible to receive is greatly needed; however the planning process is hindered by uncertainty over receipt of SVS funds.
 - A timely decision to allow Madison to receive SVS will ultimately benefit the rural residents and businesses in Madison's service area, as the company will utilize the funds to improve and expand services.