

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Petition for Waiver of South Park, L.L.C.)	

**COMMENTS OF
THE WESTERN TELECOMMUNICATION ALLIANCE
SUPPORTING
PETITION FOR WAIVER OF SOUTH PARK, L.L.C.**

The Western Telecommunications Alliance (“WTA”) hereby submits comments in support of the November 27, 2012 petition of South Park, L.L.C. (“South Park”) for waiver of both: (a) the Section 54.302 monthly cap on total federal universal service support (other than Connect America Fund Intercarrier Compensation Replacement Support); and (b) the Section 36.621(a)(5) annual study area unseparated loop cost limitations adopted in the form of quantile regression model benchmarks in the Wireline Competition Bureau’s (“WCB’s”) *Order*, DA 12-646, released April 25, 2012, and potential future WCB orders. Given the unique circumstances under which South Park operates, WTA believes that South Park’s rural Colorado customers face a significant risk of losing access to a broadband-capable network that provides both voice and broadband services, at reasonably comparable and affordable rates, in a very sparsely-populated rural area that has no comparable service or coverage from alternative providers of voice or broadband.

WTA is a trade association that represents more than 250 small rural telecommunications companies that operate in 24 states west of the Mississippi River. South Park, which serves portions of the South Park Valley of central Colorado that lacked telephone service until 1997, is a member of WTA.

The geography and demography of South Park's service/study area, by themselves, present persuasive and compelling grounds for its requested waiver. South Park serves a remote, inter-mountain area on the western slope of the Front Range of the Rocky Mountains in central Colorado. Its service area contains absolutely no towns or similar population centers. Rather, the approximately 166 access lines it serves are dispersed and scattered over approximately 603 miles, or 0.28 lines per square mile. Moreover, its rocky and mountainous terrain and severe weather greatly exacerbate the already high costs of constructing and maintaining facilities in a remote and sparsely populated area.

South Park has relied heavily upon federal universal service support since it began service in 1997. Whereas South Park's financial information has been redacted, WTA is well aware of the reliance of small rural carriers in sparsely populated areas upon federal universal service support. If such a critical revenue stream is reduced significantly, such small carriers are simply unable to make up the difference by increasing the monthly service rates of their relatively few and frequently economically struggling rural customers. Rather, these small carriers are forced to postpone or cancel investment and maintenance projects, reduce employees and operating costs, and bear the risk of watching their services and service quality degrade until customers no longer want them. In South Park's case, this downward spiral will be even more tragic and disruptive because South Park provides critical backhaul services for other wireless and wireline service providers in portions of its own and neighboring service areas, and partners

with public safety and other governmental agencies to provide various emergency and other critical public services.

South Park is the only entity that has demonstrated a sustained interest and commitment to serve its South Park Valley customers. Prior to late 1997 when South Park commenced operations, there was no telecommunications service for area residents outside the very small local towns (Hartsel and Fairplay) that larger carriers serve. Since that time, several mobile wireless carriers have offered some voice and broadband services, but such services are available primarily along roads and become increasingly intermittent as one moves further and further from the main roads.

WTA urges the Commission to grant the waiver requested by South Park. It agrees that South Park has shown the requisite special circumstances, that it has been an efficient and effective steward of its high cost support to date, that its aggregated federal universal service support, as well as its capital expenditures and operating expenses, are reasonable and prudent in light of the geography and demography of its service area, and that the requested targeted waiver will serve the public interest.

Respectfully submitted,
WESTERN TELECOMMUNICATIONS ALLIANCE

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