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January 31, 2020

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: WC Docket No. 18-89
PS Docket Nos. 19-351, 19-352

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we provide you with notice of oral ex parte presentations in connection with the above-captioned proceedings. On January 30, 2020, Brian Woody, Eric Woody, Jason Wilcox, and undersigned counsel, on behalf of Union Telephone Company d/b/a Union Wireless ("Union Wireless") met with Erin McGrath in Commissioner O'Rielly's office to discuss the above-referenced dockets.

With respect to the Commission's recent Report and Order, Further Notice of Proposed Rulemaking, and Order concerning the nation's communications supply chain,¹ Union Wireless explained that it expects to incur extraordinary costs in money, time, and company resources, to overlay its mobile wireless network with new core and base station equipment, and then remove the equipment currently providing service across approximately 80,000 square miles of rural area in Wyoming, Utah, Idaho, Colorado, and Montana.

Union Wireless also explained that failure to adopt a sufficient reimbursement mechanism providing an appropriate path to replace its network in an orderly fashion would be an existential threat to its business. In adopting new restrictions on the use of equipment from covered companies, Union Wireless urged the Commission to avoid situations where currently operating providers are unable to replace existing gear or fill in dead zones in rural areas. Base station equipment intended to increase capacity at existing sites, equipment needed to eliminate coverage gaps, spares, and equipment currently in inventory or on order that uses the same technology as the existing network, should be exempted from any ban on the use of equipment from a covered company until a reimbursement mechanism is operational.

¹ *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, FCC 19-121, Report and Order, Further Notice of Proposed Rulemaking, and Order, (rel. Nov. 26, 2019).

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Finally, Union Wireless urged the Commission to take into account that 5G technology is rapidly advancing and there may soon be American equipment suppliers or other technical solutions that expand the range of options available to small rural carriers. As these options advance, additional competition will reduce pricing and increase the efficiency of any reimbursement mechanism.

Should you have any questions, please contact undersigned counsel directly.

Respectfully submitted,



David LaFuria
Counsel for
Union Telephone Company d/b/a Union Wireless

cc: Meeting Attendees