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October 24, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Notice of Ex Parte Presentation - U.S. Virgin Islands Hurricane
Restoration Relief (WC Docket Nos. 11-42, 10-90, 02-60, and WT Docket
No. 10-208)*

Dear Ms. Dortch:

On Friday, October 20, 2017, ATN International Inc., on behalf of its operating subsidiaries in the United States Virgin Islands Virgin Islands Telephone Corp. and Innovative Long Distance, Inc., collectively doing business as Viya Telephone (and formerly doing business as Innovative Telephone or Vitelco); Vitelcom Cellular, Inc. doing business as Viya Wireless (formerly Innovative Wireless or Vitelcom); and Choice Communications, LLC (“Choice”), a mobile wireless provider whose business will be combined with Viya Wireless¹ (collectively “Viya”) met with Michael Carowitz, Jay Schwarz, and intern Ryan McDonald of the Office of Chairman Ajit Pai to discuss its petitions for relief from the damages caused by Hurricanes Irma and Maria.² In the meeting, Viya was represented by Douglas Minster, Vice President, Government and Regulatory Affairs; Rohan Ranaraja, Director, Regulatory Affairs; and undersigned counsel.

¹ Viya Wireless and Choice are commonly controlled by parent company ATN International, Inc. (“ATN”). The Commission has consented to the transfer of control of certain Choice wireless licenses to Viya Wireless as part of ATN’s planned combination of Choice with Viya Wireless. *See* ULS File Nos. 0007764065, 0007764074. This transaction has not yet been consummated.

² *Emergency Petition for Supplemental Universal Service Support to Restore Wireless Networks in Hurricane-Devastated Insular Areas*, Emergency Petition (filed Oct. 5, 2017) (“Insular Wireless Relief Petition”); *Lifeline and Link Up Reform and Modernization, et al.*, Emergency Petition (filed Oct. 5, 2017) (“Universal Service Relief Petition”).

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With regard to the Insular Wireless Relief Petition, Viya noted that wireless carriers in the U.S. Virgin Islands do not receive any appreciable high-cost universal service support. As a result, there is an urgent need for a targeted infusion of support to ensure that wireless networks are rebuilt and hardened to resist future storms. The challenging economic conditions in the Territory, limiting carrier revenue potential, heightens the need for relief.

With regard to the Universal Service Relief Petition, Viya observed that there is a strong argument for special Lifeline and Link Up support in the U.S. Virgin Islands. The economic impact of Hurricanes Irma and Maria on the Virgin Islands' economy has been, and will continue to be, much more severe than the impact of Katrina on any state. The standard Lifeline support amount of \$9.25 is not sufficient to provide long-term support to a significant portion of the customer base. The lifting of the port freeze was the right decision, but it makes Link Up support important.³ Viya also suggested that the Commission may wish to provide E-rate applicants in the U.S. Virgin Islands (and potentially other hurricane-affected areas) greater flexibility for service provider changes, even if on a temporary basis, to ensure that schools and libraries can obtain the services that they need without delay given the variability of network recovery times. Finally, in light of the immediate need to plan for long-term post-hurricane reconstruction, Viya Telephone also stressed the need for certainty as to the term of its frozen high-cost support.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/
L. Charles Keller

cc: Michael Carowitz
Jay Schwarz
Ryan McDonald

³ The FCC adopted the port freeze rule in recognition of the time it takes for carriers to recover the cost of a broadband-capable devices. *Lifeline and Link Up Reform and Modernization, et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 4106 ¶ 389 (2016) (“We find that allowing broadband providers the security of a longer term relationship with subscribers will incentivize greater up-front investments from providers. Those investments in broadband -capable devices and broadband services should improve the quality of new offers for subscribers and further spur competition among providers to offer more innovative services.”).