

# Morgan Lewis

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October 24, 2019

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

**Re: Notice of Ex Parte Communication**  
**WC Docket No. 02-6: Request for Expedited Waiver by Hunt**  
**Telecommunications, LLC**

Dear Ms. Dortch:

On October 22, 2019, Jeffrey Strenkowski, Vice President, Deputy General Counsel of Governmental Affairs for Uniti Fiber<sup>1</sup> and the undersigned counsel met with D'wana Terry, Associate Bureau Chief, Ryan Palmer, Division Chief, Gabriela Gross, Deputy Division Chief, Bryan Boyle, Assistant Division Chief, James Bachtell, Assistant Division Chief, Stephanie Minnock, Attorney Advisor, and Hayley Steffen, Attorney Advisor of the Wireline Competition Bureau.

Uniti Fiber discussed the timeline of events and issues presented in the request for expedited waiver filed August 5, 2019, by Hunt Telecommunications, LLC ("Hunt Telecom") seeking an expedited waiver of Section 54.620 of the Commission's Rules for the Bureau to take any and all actions necessary for Hunt Telecom to receive full payment for non-recurring charges in connection with Hunt Telecom's delivery of dark fiber to the Caddo Parish School District ("Caddo") in Funding Year 2016. The timeline of events provided as Attachment A was distributed to the meeting attendees.

As shown in Attachment A, USAC issued the first Funding Commitment Decision Letter ("FCDL") in connection with the Caddo dark fiber on March 2, 2017. This FCDL cancelled FRN No. 1699105037 and issued FRN No. 1699144613 to remove a reference to special construction "based on supporting documentation." In addition to issuing the new FRN, this FCDL approved \$4,402,484 in E-rate support for the dark fiber delivered to Caddo in Funding Year 2016. USAC issued a post-

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<sup>1</sup> "Uniti Fiber" refers to a group of companies commonly owned by Uniti Group Inc. that provide telecommunications and other services in various parts of the U.S. It is comprised of Southern Light, LLC, Uniti Fiber LLC, Hunt Telecommunications, LLC, Information Transport Solutions, Inc., and certain other affiliated service providers.

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commitment revised FCDL which maintained \$4,402,484 in E-rate support approved for FRN No. 1699144613 and indicated that the last date to submit an invoice under this FRN would be January 28, 2019 "as a result of an approved late FCDL." Uniti Fiber understands that there were substantial delays in USAC's issuance of FCDLs for Funding Year 2016.

Please do not hesitate to contact the undersigned if you have any questions.

Sincerely,

*/s/ Tamar E. Finn*

Tamar E. Finn  
Christian E. Hoefly Jr.  
Patricia C. Cave

*Counsel to Uniti Fiber*

cc: D'wana Terry, Associate Bureau Chief, Wireline Competition Bureau  
Ryan Palmer, Division Chief, TAPD, Wireline Competition Bureau  
Gabriela Gross, Deputy Division Chief, TAPD, Wireline Competition Bureau  
Bryan Boyle, Assistant Division Chief, TAPD, Wireline Competition Bureau  
James Bachtell, Assistant Division Chief, TAPD, Wireline Competition Bureau  
Stephanie Minnock, Attorney Advisor, TAPD, Wireline Competition Bureau  
Hayley Steffen, Attorney Advisor, TAPD, Wireline Competition Bureau

**Attachment A**

**Timeline of Events:**

**Hunt Telecommunications, LLC's Request for Expedited Waiver**

## Timeline of Events: Hunt Telecommunications, LLC's Request for Expedited Waiver

