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WASHINGTON, DC 20006

October 29, 2018

SUBMITTED ELECTRONICALLY VIA ECFS

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

Re: **MEETING SUMMARY PER SECTION 1.1208 OF THE FCC'S RULES**
Schools and Libraries Universal Service Support Mechanism,
Docket No. 02-6

Dear Ms. Dortch:

On behalf of the Missouri Research and Education Network (MOREnet), this *ex parte* memorializes the October 23, 2018 conference call between the undersigned counsel for MOREnet and Jamie Susskind, Commissioner Carr's Chief of Staff, regarding MOREnet's Request for Review and/or Waiver.¹

MOREnet noted that USAC requires consortia to calculate its discount by taking the average of the consortia members on an application via its IT system implemented in 2016. No rules changed from FY 2013 and FY 2014 – the years at issue – that would have resulted in or required different calculation methodologies. MOREnet calculated its discount in FYs 2013 and 2014 exactly the same way that USAC is doing so today.

MOREnet noted that it would be fundamentally unfair for the Commission to acknowledge that consortia applicants had the flexibility under the rules to include members on their applications and to seek comment on changing those rules but require a consortia to calculate the discount in a particular way, even when the Commission had not adopted such a requirement.²

¹ Request for Review and/or Waiver, *In the Matter of Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Missouri Research and Education Network (filed Mar 23, 2018).

² *Id.*

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket and sent to Ms. Susskind. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Gina Spade

Gina Spade
Counsel for the Missouri Research and Education Network

cc: Jamie Susskind (via email)