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FILED VIA ECFS

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

Re: **Broadband VI, LLC**
The Uniendo a Puerto Rico Fund and the Connect USVI Fund,
WC Docket No. 18-143
Notice of Ex Parte Presentations

Dear Ms. Dortch:

On March 5, 2019, Bill Neville, CEO of Broadband VI, LLC (“BBVI”), David Zumwalt, COO of BBVI, Michael Meluskey, CTO and co-founder of BBVI, Kevin Hughes, Chief Marketing Officer of BBVI, and undersigned counsel to BBVI met in separate meetings with the following: (1) the Wireline Competition Bureau and Office of Economics and Analytics listed on Exhibit 1, (2) Randy Clarke, Legal Advisor to Commissioner Geoffrey Starks, and (3) Travis Litman, Legal Advisor to Commissioner Jessica Rosenworcel.¹ The meetings focused on Stage 2 funding procedures under consideration by the Commission in the above-referenced proceeding and BBVI’s proposals regarding the same.²

The BBVI representatives provided a brief background on the company and its successful restoration efforts following Hurricanes Irma and Maria in 2017. We then discussed the two-step process for awarding Stage 2 support that BBVI proposes. Step 1 sets basic eligibility requirements. Step 2 establishes a weighted point system that compares one eligible applicant’s

¹ Messrs. Meluskey and Hughes did not participate in the meeting with Mr. Litman.

² See *The Uniendo a Puerto Rico Fund and Connect USVI Fund, et al.*, Order and Notice of Proposed Rulemaking, FCC 18-157, WC Docket Nos. 18-143, 10-90 and 14-58 (rel. May 29, 2018) (“*Connect USVI Fund NPRM*”). BBVI presented its proposals in an ex parte communication submitted November 9, 2018 in the above-referenced proceeding.



proposed network resiliency and restoration, network deployment timetable, and network performance against those of other eligible applicants. The BBVI representatives explained that using comparative network criteria is the most appropriate and most expeditious approach available because of the relatively small number of applicants expected to seek Stage 2 funding for the U.S. Virgin Islands and the need to vet resiliency and restoration criteria before the Commission selects an entity to which it will provide support. We also explained that network resiliency and restoration should be given the most weight of the three criteria to promote the hardening of communications networks in a manner that can best withstand the inevitable natural disasters to come.

We asked that the Commission complete the Stage 2 process in advance of the 2019 hurricane season, which begins June 1.

Copies of the attached presentation summarizing BBVI's proposal, were distributed to the Commission representatives during the meetings. BBVI notes that the attached proposal awarding points based on a network's performance differs slightly from, and supersedes, the comparable proposal submitted by BBVI in its November 9, 2018 ex parte letter.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceeding.

Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran

Attachments

cc: Randy Clarke
Travis Litman
Attendees on Exhibit 1

Exhibit 1
List of Commission Attendees

Allison Baker

Octavian Carere

Rebekah Douglas

Dan Kahn

Alex Minard

Dang Khoa Nguyen

Ryan Palmer

Eric Ralph