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|  | 1300 NORTH 17th STREET, 11th FLOOR  ARLINGTON, VIRGINIA 22209  OFFICE: (703) 812-0400  FAX: (703) 812-0486  www.fhhlaw.com  www.commlawblog.com    March 15, 2019 | DONALD J. EVANS  (703) 812-0430  evans@fhhlaw.com |

Ms. Marlene Dortch, Secretary

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

Re: EX PARTE NOTICE

The Uniendo a Puerto Rico and the Connect USVI Fund,

WC Docket No. 18-143, WC Docket No. 10-90 and

WC Docket No. 14-58

Dear Ms. Dortch:

This ex parte submission is intended to supplement the Comment filed by Tri-County Telephone, Inc. (TCT) on July 26, 2018. TCT is both a recipient of high cost funds from the Universal Service Fund and a significant contributor to that fund. Because the Commission requires covered common carriers like TCT to contribute to the USF sufficient moneys to cover the distributions from the USF, TCT (like other carriers) will bear a portion of the multi hundred million hundred dollar relief grant to Puerto Rico even if the Puerto Rico/USVI Funds are set up separately so as not to impact the availability of funds available for high cost carriers elsewhere.

While the Commission has established Article III-type standing thresholds for filing petitions for reconsideration of Commission actions, it has never applied that standard to comments in a rulemaking proceeding, nor should it. To do so would prevent members of the public, not to mention elected official, academics and think tank institutions, from providing valuable input into Commission policy decisions. But in any case, TCT will indeed be aggrieved by the Commission’s distribution of the proposed funds and the forgiveness of the credit due against funds already provided to Puerto Rico and VI carriers.

Sincerely,

Donald J. Evans

Counsel for Tri-County Telephone, Inc.

cc: Rebekah Douglas