



April 4, 2019

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: The Uniendo a Puerto Rico Fund and the Connect USVI Fund, Connect America Fund, ETC Annual Reports and Certification, WC Docket Nos. 18-143, 10-90, and 14-58

Dear Ms. Dortch:

On April 4, 2019, Hughes Network Systems, LLC (“Hughes”) met with Arielle Roth, policy advisor for Commissioner O’Rielly, to discuss its proposal for the award mechanism of the Uniendo a Puerto Rico Fund and the Connect USVI Fund in the above-referenced proceeding. Hughes was represented by Jennifer A. Manner, Senior Vice President, Regulatory Affairs and Jodi Goldberg, Associate Corporate Counsel, Regulatory Affairs.

In the meetings, the parties discussed the attached talking points, summarizing the scoring proposal that Hughes filed as an ex parte in October 2018.¹ Hughes discussed the benefits of applying an objective, technology-neutral bidding framework to the distribution of universal service funds, and the need for the final determinations to be made by a neutral third party arbiter. The talking points were distributed to Ms. Roth.

Pursuant to the Commission’s rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

/s/ Jodi Goldberg

Jodi Goldberg
Associate Corporate Counsel
Hughes Network Systems, LLC
(301) 428-7140

Attachment

cc: Arielle Roth

¹ Hughes ex parte in WC Docket Nos. 18-143 et al. filed October 23, 2018.



Proposed Structure for a Technology Neutral, Objective Rubric for Scoring Bids in Phase 2 of the Uniendo a Puerto Rico Fund and the Connect USVI Funds

April 2019

The Commission must adopt clear, unambiguous, and objective criteria with which to evaluate bids, evaluated by a neutral third party arbiter. The scoring rubric should be based on and weighted according to the Commission's stated objectives in the PR/USVI Fund NPRM:

40 points	Price per Location
20 points	Network Resiliency
20 points	Network Deployment Timing
20 points	Network Performance

Proposed Scoring for the Four Criteria:

1) Price Per Location

0 points	Reserve price
10 points	10 percent below reserve price
20 points	20 percent below reserve price
30 points	30 percent below reserve price
40 points	40 percent or more below reserve price

2) Network Resiliency

0 points	Non-hardened networks
10 points	Semi-hardened networks
20 points	Fully hardened networks

3) Network Deployment Timing

0 points	40/60/80/100 percent of build-out in years 3-6, respectively
10 points	50/70/100 percent of build-out in years 2-4, respectively
20 points	100 percent of build-out by end of year 2

4) Network Performance

Speed:

0 points	10/1 Mbps
4 points	25/3 Mbps
7 points	100/20 Mbps +

Capacity:

0 points	150 GB
4 points	> 150 GB or US median (whichever is higher)
7 points	2 TB



Latency:

0 points	> 100 ms
6 points	100 ms or less

By equitably weighing its four enumerated objectives: resiliency, cost, timing, and performance, the Commission can ensure the implementation of a fair and neutral, non-auction procedure for the distribution of the PR/USVI Funds and, by extension, that the communication infrastructure needs of Puerto Rico and the U.S. Virgin Islands will be met in an expedient and objective manner.