

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
The Uniendo a Puerto Rico and the Connect USVI Fund)	WC Docket No. 18-143
)	
Connect America Fund)	WC Docket No. 10-90
)	
ETC Annual Reports and Certifications)	WC Docket No. 14-58

STANDING SUPPLEMENT TO PETITION FOR RECONSIDERATION

This submission is intended to supplement the Petition for Reconsideration filed by Tri-County Telephone Association, Inc. (TCT) on July 13, 2018 to further support TCT's standing to file this Petition. 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 \$60+ million 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.

Accordingly, 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.

April 22, 2019

Respectfully submitted,

Tri-County Telephone Association, Inc.

By: _____/s/
Donald J. Evans, Esq.
Fletcher, Heald and Hildreth, PLC
1300 N 17th St., 11th Floor
Arlington, VA 22209
703-812-0400
evans@fhhlaw.com