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April 30, 2019

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

Re: ***Connect America Fund
Procedures to Identify and Resolve Location Discrepancies in Eligible Census
Blocks within Winning Bid Areas
WC Docket No. 10-90
Notice of Oral Ex Parte Communication***

Dear Ms. Dortch:

On April 29, 2019, Sam Curtis of @Link Services, LLC, Nathan Stooke of Wisper ISP, and the undersigned, representing the Wireless Internet Service Providers Association (“WISPA”), met with Alex Minard and Nissa Laughner of the FCC’s Wireline Competition bureau to discuss matters related to the above-referenced proceeding.¹

The WISPA representatives indicated that it would be necessary, in light of the pendency of the proceeding and the need for Paperwork Reduction Act (“PRA”) approval, for the Commission to extend the one-year deadline contemplated for Connect America Fund (“CAF”) recipients to file evidence of discrepancies in the “locations” they are required to serve. We suggested that the filing deadline be at least 60 days following PRA approval.

The WISPA representatives also reiterated WISPA’s support for allowing CAF recipients to have flexibility in the methods they use to determine “locations” for purposes of the evidentiary showing, and that “relevant stakeholders” should be required to counter any such showing with a methodology and not simply criticism of the CAF recipient’s methodology.

¹ *Public Notice*, Wireline Competition Bureau Seeks Comment on Procedures to Identify and Resolve Location Discrepancies in Eligible Census Blocks within Winning Bid Areas, DA 18-929, WC Docket No. 10-90 (rel. Sept. 10, 2018).



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WISPA also stated that “relevant stakeholders” should be located in the area in question and should not include competitors.

Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being filed in ECFS in the above-referenced docket. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ Stephen E. Coran

Stephen E. Coran

cc: Alex Minard
Nissa Laughner
Sam Curtis
Nathan Stooke