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May 24, 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 May 23, 2019, Claude Aiken President & CEO of the Wireless Internet Service Providers Association (“WISPA”) and undersigned counsel to WISPA met with Preston Wise, legal advisor to Chairman Ajit Pai, 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”) Phase II recipients to file evidence of discrepancies in the “locations” they are required to serve.

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 have the option to include as “locations” new development in whole or in part if they choose. We also emphasized that “relevant stakeholders” should be required to counter a CAF recipient’s showing with a methodology and not simply criticism of the CAF

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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recipient's methodology. 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: Preston Wise