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May 29, 2019

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket Nos. 10-90, 14-58, 07-135, and CC Docket No. 01-92**  
**JSI**  
**Notice of *Ex Parte***

Dear Ms. Dortch:

On Friday, May 24, 2019, Steve Meltzer, John Kuykendall and Cassandra Heyne of JSI met via conference call with Preston Wise, Office of Chairman Ajit Pai, to discuss issues related to Alternative Connect America Model (A-CAM) support to seek guidance from the FCC regarding questions JSI has received from clients who are considering electing A-CAM II when their due diligence reveals that the actual number of locations in supported census blocks are significantly less than the number shown in the model. During the discussions, JSI sought assurances that these companies will have A-CAM support reduced as contemplated in paragraph 34 of the 2016 Reform Order<sup>1</sup> according to a waiver process or other appropriate mechanisms the FCC establishes as opposed to being penalized as set forth in Section 54.320(d)(2) because they are unable to deploy to the number of locations specified in the model.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall, Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Preston Wise

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<sup>1</sup> Connect America Fund, ETC Annual Reports and Certifications, Developing a Unified Inter-carrier Compensation Regime, WC Docket No. 10-90, et al., Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Rcd 3087, para. 34 ("2016 Reform Order").