

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
The Uniendo a Puerto Rico Fund and the Connect)	WC Docket No. 18-143
USVI Fund)	
To: The Commission		

COMMENTS OF VPNET, INC.

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July 26, 2018

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SUMMARY

VPNet, Inc. (“VPNet”) commends the Commission for establishing a long-term funding opportunity to rebuild, improve, and expand broadband networks in Puerto Rico. Stage 2 of the Uniendo a Puerto Rico Fund, if properly implemented, will help to establish a reliable level of fixed broadband service able to withstand the impact of future natural disasters.

The Commission’s proposals to implement Stage 2 are comprehensive and largely appropriate. VPNet in particular agrees that the budget appears at this time to be adequate, as is the method of awarding that support – by using a competitive proposal process open to those that provided service to the public prior to the 2017 hurricanes. VPNet also supports the proposal that all of Puerto Rico be eligible for Stage 2 funding rather than select areas of the Territory, and recommends the census tract level as the most suitable minimum geographic area for support. While service should be required to be deployed to all locations within the geographic area, the Commission should allow support recipients to demonstrate annually that there are fewer locations than the Commission’s estimates, and to have their support requirements reduced accordingly.

VPNet believes that winning proposals should be selected based primarily on price per-location as proposed by the Commission, but with adjustments made to reward the proposals with the fastest network deployment. VPNet opposes package bidding because the small number of applicants anticipated does not justify the complexity of a package bidding variant. The Wireline and Wireless Bureaus rather than the Universal Service Administrative Company should be tasked with evaluating proposals.

VPNet supports the Commission’s proposed service and deployment obligations as appropriate measures to promote acceptable performance and build-out requirements. The

Commission’s oversight proposals likewise make sense – in particular, the proposal to reassess deployment obligations by the fifth year of the funding term. The likelihood of changed circumstances warrants this midterm review. VPNet, however, opposes any requirement that a support recipient must obtain a letter of credit as the sole basis for financial security. Performance bonds should be permitted as well as an alternative means to mitigate financial exposure in the event of default.

As how to best “storm-harden” rebuilt networks, VPNet believes any standard the Commission adopts should be objective and independent. In addition, VPNet believes that as a condition of receiving Stage 2 support, a recipient should be required to use best efforts to participate in the Disaster Information Reporting System, and encouraged to coordinate voluntarily to reduce duplicative facilities and share infrastructure and costs where possible.

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VPNet, Inc. (“VPNet”), by counsel and pursuant to Sections 1.415 and 1.419 of the Commission’s Rules, hereby comments on proposed rules and procedures for Stage 2 of the Uniendo a Puerto Rico Fund (the “Puerto Rico Fund”).¹ As further described below, the Commission should adopt many of its proposals, incorporate VPNet’s recommendations, and ensure that any process it implements includes technology-neutral competitive elements that favors expeditious deployment of broadband networks that meet baseline speed and latency performance and disfavors support to larger incumbent providers.

Introduction

Founded in 2008 and based in Cidra, Puerto Rico, VPNet is a privately owned provider of fixed wireless broadband services in rural areas of Puerto Rico. It offers a variety of information technology and telecommunication related services, with an emphasis on providing primary and redundant services to commercial and residential customers located in rural areas throughout the Territory. VPNet is one of only a small number of providers servicing remote

¹ *The Uniendo a Puerto Rico Fund and the Connect USVI Fund, et al.*, Order and Notice of Proposed Rulemaking, FCC 18-57, WC Docket Nos. 18-143, 10-90 and 14-58 (rel. May 29, 2018) (“*NPRM*”). *See also The Uniendo a Puerto Rico Fund and the Connect USVI Fund, et al.*, Order, DA 18-670, WC Docket Nos. 18-143, 10-90 and 14-58 (rel. June 27, 2018) (extending Comment deadline to July 26, 2018). VPNet’s Comments are limited to addressing the Puerto Rico Fund program, and VPNet takes no position on rules the Commission may adopt for the Connect USVI Fund.

areas of Puerto Rico, including Cidra, Aguas Buenas, Aibonito, Guaynabo, Comerio and Cayey, among many others.

VPNet's operations, infrastructure, equipment and customer base were severely affected by Hurricanes Irma and Maria. The area of the main island hit hardest by Hurricane Maria, the mountainous southeast region, is home to many of VPNet's commercial and residential customers. The resulting damage was both widespread and complete. Until service was partially restored by the local exchange carrier and mobile broadband providers, VPNet became the sole provider of telecommunications services to the Cidra Town Hall, the largest hospital system serving more than 300,000 residents, and all critical service offices of the municipality. VPNet provided communications services to FEMA in the months and weeks following Hurricane Maria to support vital broadband connections needed to assist in the federal government's recovery efforts. VPNet also connected most of the credit unions so that consumers could conduct financial transactions in the aftermath of the hurricanes.

Over the last six months, VPNet has focused on rebuilding its network and restoring normal operating conditions, primarily relying on its own resources to do so and without outside financial support. As of today, approximately 95 percent of VPNet's pre-hurricane customers have resumed their regular commercial services. Yet despite the substantial strides taken and significant resources expended by VPNet to resume operations, its ability to return to full normalcy remains predicated on the availability of additional financial resources to complete the rebuild of its operating network, security centers and backbone, to expeditiously install new customer premise equipment, to make its network more resilient and less susceptible to natural disasters, and to expand service to areas that are unserved by fixed broadband.

VPNet has not previously relied on federal or state support, capital or credit relationships with local commercial banks, or other financing venues; its growth has instead been funded with capital from the company's founder with excellent credit terms extended by its main suppliers, and by VPNet's positive cash flow from operations over the years. However, access to liquidity is now a significant challenge, particularly in light of the current 2018 hurricane season.

The Commission's establishment of the Puerto Rico Fund is therefore a very welcome and very timely development, and VPNet greatly appreciates the Commission's initiative and commitment to expeditiously making critical support available to those that suffered from the 2017 hurricanes. On June 27, 2018, VPNet submitted a Certification to the Commission seeking Stage 1 funding² for accelerated, one-time support to help VPNet cover the short-term costs of rebuilding its network and restoring service to customers. But, as the Commission acknowledges, one-time, short-term support will not be sufficient to meet the needs of the Puerto Rican public that requires long-term support so that broadband providers have resilient and redundant networks that can better withstand the inevitable natural disasters to come.

VPNet anticipates using Stage 2 funding to aid in the continuing recovery and restoration of its network, to prepare for the 2018 and 2019 hurricane seasons, and to expand the company's broadband coverage while building a backup and recovery network throughout the Territory. As a fixed wireless broadband service provider, VPNet is well positioned to put Stage 2 money to immediate good use due to its ability to deploy primary services in a quick and cost-effective manner and to provide fiber operation redundancy on a secondary basis where available.

As explained below, VPNet believes that long-term support available through the Puerto Rico Fund should be made available under a competitive process that does not categorically exclude small providers or favor those that rely on certain technologies. Rather, the Commission

² See Letter from Felipe Hernandez, VPNet President, WC Docket No. 18-143 (filed June 27, 2018).

should award support through a competitive process that credits identified public interest objectives. Here, however, those benefits should favor the expeditious provision of baseline broadband service and network resiliency. Given the relatively small number of applicants that are expected to be eligible for funding, VPNet believes that this process will be significantly less complicated and easier to administer than the Connect America Fund (“CAF”) Phase II reverse auction, thereby accelerating deployment of facilities and private investment.

Discussion

I. THE AMOUNT BUDGETED FOR THE PUERTO RICO FUND APPEARS TO BE APPROPRIATE, BUT THE COMMISSION SHOULD RESERVE THE RIGHT TO MAKE ADDITIONAL SUPPORT AVAILABLE IF NECESSARY

The Commission proposes to make \$444.5 million available over a ten-year term for supporting fixed broadband networks in Puerto Rico and \$254 million over three years to support 4G LTE mobile broadband networks.³ VPNet believes that these amounts and the division of funds between fixed and mobile networks should prove to be appropriate. The Commission, however, should reserve the right to budget for additional support if the funding amounts are shown by annual reports to be inadequate to meet the Puerto Rico Fund objectives or subsequent natural disasters mandate the need for additional support. Equally important, the Commission should refrain from decreasing funding levels because recipients will have significant long-term reliance interests that factor into budgeting for private capital investment to undertake construction and maintenance activities.⁴

³ See *NPRM* at ¶ 30.

⁴ Because to the Commission’s decision to quickly award Stage 1 support to multiple eligible providers, VPNet does not believe that it is necessary for the Commission to adopt the proposals in PRTC’s January 19, 2018 petition to establish a fund to subsidize restoration of broadband services in insular areas of Puerto Rico. See *id.* at ¶ 97.

II. THE COMMISSION SHOULD AWARD SUPPORT THROUGH A COMPETITIVE PROCESS

A. Properly Implemented, A Competitive Process Can Award Support In An Expeditious, Efficient, And Effective Manner

To award support, the Commission proposes to use a competitive application process similar to a request for proposal process.⁵ VPNet believes that, if implemented in an impartial, technology neutral manner that takes into account build-out timetables, performance, and network resiliency, such a process can enable the Commission to fairly and expeditiously award support in time for the 2019 calendar year. A primary reason why a competitive application process can be the best alternative is the relatively small number of anticipated applicants for support, which should require limited Commission resources to review, consider, and compare proposals. The Commission also proposes a ten-year funding term, a time frame that VPNet supports.⁶

However, as a small, fixed wireless provider, VPNet is concerned that a competitive application process could be skewed by larger wireline incumbents that have a long history of dealing with the Commission. Accordingly, the Commission's process should be objective, open to all eligible providers (i.e., those providing service as of June 30, 2017) regardless of regulatory classification and technology, and free from outside influence. If a fair and transparent process and appropriate safeguards cannot be assured, then VPNet believes that the single-round, sealed bid approach will be the best alternative because it eliminates any subjectivity inherent in reviewing proposals.

⁵ See *id.* at ¶ 39.

⁶ See *id.* at ¶ 41.

The two other options on which the Commission seeks comment – the negotiated alternative⁷ and the frozen-support alternative⁸ – are flawed approaches that most assuredly will favor a limited class of potential applicants and therefore should not be adopted. Conducting negotiations with support applicants could exclude or undermine participation by other qualified providers and lacks transparency, thereby exposing it to undue outside influence. The Commission absolutely should not adopt the frozen-support option that would make funding available only to the incumbent local exchange carrier and would not allow other broadband or voice providers to receive any support. Such a scheme would further enrich the larger incumbent and make it more difficult for smaller companies like VPNet to stay competitive or even afloat, or provide necessary redundant facilities. This approach also would disregard the recent past when VPNet, a small fixed wireless broadband company, was able to restore operations immediately following the hurricanes and became the “go-to” company for essential services provided to local first responders and FEMA in hard-hit rural areas of Puerto Rico.

By awarding support to multiple parties, the Commission will have more providers building redundant networks and will promote competitiveness among a variety of providers and technologies. And, by using a competitive application process, the Commission can fund more unserved and underserved locations in a more cost-effective way.

B. Existing Providers That Filed Form 477 As Of June 30, 2017 Should Be Eligible For Puerto Rico Fund Support

The Commission proposes that providers with existing fixed networks that provided broadband service reported as of the June 2017 Form 477 should be eligible to apply for Puerto Rico Fund support.⁹ VPNet agrees that only those network operators affected by the 2017

⁷ See *id.* at ¶¶ 75-77.

⁸ See *id.* at ¶¶ 78-79.

⁹ See *id.* at ¶ 42.

hurricanes should be eligible for support. Service providers that did not operate broadband networks until after June 30, 2017 should not be eligible for any windfall support that is better directed to those providers that suffered actual and substantial financial losses and, like VPNet, are investing substantial private capital to restore their networks and operations.

VPNet also agrees that financial and technical capabilities should be part of the evaluation process, and that such capabilities should be assessed one time as part of the response to the Commission's invitation for proposals.¹⁰ Unlike multi-stage application processes such as the approach the Commission is using in the CAF Phase II auction, a single-stage application approach furthers the Commission's goal of expediting support. To be eligible for support, all applicants should demonstrate that they will deploy technology that will support a specific disaster recovery plan.

VPNet concurs with the Commission's proposal to permit providers to obtain eligible telecommunications carrier ("ETC") designation after being selected as a support recipient.¹¹ Although ETC designation is ultimately necessary before receiving support, there is no compelling reason to require that designation to precede the awarding of support. Allowing for post-award ETC designation will open the door for more Stage 2 participation and thereby enhance the likelihood of a speedier recovery and hardening process. The Commission adopted similar processes for the rural broadband experiment program and the CAF Phase II reverse auction, and there is no reason to impose a different, limiting, and more burdensome, approach here.

¹⁰ See *id.* at ¶ 43.

¹¹ See *id.* at ¶ 44.

C. Support Should Be Made Available Across All Of Puerto Rico, And Within Minimum Geographic Areas Of Census Tracts

The Commission proposes that all of Puerto Rico be eligible for Stage 2 funding and not just select areas of the Territory.¹² VPNet supports this proposal because, as the Commission notes, doing so will encourage applicants to expand service to areas that were previously unserved or underserved. Territory-wide eligibility has another benefit as well. Unlike the CAF Phase II auction, identifying “unserved” areas that were formally “served” is not a straightforward task where hurricane-ravaged Puerto Rico is concerned. Allowing for eligibility across the whole of Puerto Rico will expedite support by avoiding the delays resulting from having to resolve challenges to determinations of whether a particular area is served or unserved as of a date certain.

Support recipients should be required to deploy service to all locations within the subject geographic area, not just those that are funded.¹³ VPNet agrees that this requirement would be consistent with the goals of the Puerto Rico Fund in making support benefits more widely available.¹⁴ VPNet cautions, however, that should the Commission rely on data that overestimates the number of locations eligible for support, recipients should be permitted to provide evidence that there are fewer locations and have support reduced on a *pro rata* basis.¹⁵ The Commission adopted a similar approach in the CAF Phase II process based on submissions that, in certain cases, showed that the Commission’s data overstated the number of locations.¹⁶

¹² See *id.* at ¶¶ 45-46.

¹³ See *id.* at ¶ 49.

¹⁴ See *id.*

¹⁵ See *id.* at ¶ 51.

¹⁶ See Public Notice, “Connect America Fund Phase II Auction Scheduled for July 24, 2018 Notice and Filing Requirements and Other Procedures for Auction 903,” FCC 18-6 (rel. Feb. 1, 2018), at 9.

VPNet believes recipients should be able to make this showing on an annual basis, and not just one time, to reflect the continuing transient nature of the Puerto Rican population.¹⁷

VPNet believes that applicants should apply for support at the census tract level. There are 78 municipalities, 945 census tracts, 2,594 census block groups, and 77,189 census blocks in Puerto Rico.¹⁸ The Commission has used census-designated areas to award rural broadband experiment and CAF support in the other states and territories. In particular, the Commission is using census block groups, which are smaller in area than census tracts, to award CAF Phase II support.¹⁹ VPNet believes that serving all locations in a municipality may prove to be very challenging in rural, mountainous areas that lack infrastructure and electrical power and, therefore, some remote municipalities may either receive no bids or the winning bidder may not be able to meet the performance requirements. By contrast, areas smaller than census tracts will require more resources for applicants to design more detailed networks and to prepare bids, and for the Commission to review them. Using smaller areas also may lead to more of a patchwork quilt of supported and unsupported areas. Reliance on census tracts is thus a workable middle ground that will enable support to be based on the number of locations in the geographic area and on the obligation to serve all such locations.

D. Reserve Prices Should Be Set As The Commission Proposes

The Commission proposes to set reserve prices using a three-step process, which includes establishing separate high-cost and extremely high-cost thresholds.²⁰ VPNet supports this approach, but adds that the threshold for extremely high-cost areas should account for greater need for support in insular, rural areas where deployment costs will unavoidably be higher.

¹⁷ See *NPRM* at ¶ 49.

¹⁸ See *Guide to State and Local Census Geography*, available at https://www2.census.gov/geo/pdfs/reference/guidestloc/pr_gslcg.pdf (last visited July 23, 2018).

¹⁹ See *Connect America Fund*, Report and Order, 29 FCC Rcd 15644, 15674 (2014).

²⁰ See *NPRM* at ¶¶ 52-53.

E. The Selection Process Should Be Technologically Neutral And Favor Cost-Effectiveness

The Commission proposes to select winning proposals based primarily on price per-location served but with bid adjustments that consider such factors as network deployment timing, network performance, and network resiliency.²¹ VPNet generally agrees with the per-location approach as the best means to promote cost-effectiveness.

As to the adjustment factors to consider, VPNet believes expeditious network deployment should be strongly favored because it is the one criterion most aligned with the overarching goal of quickly rebuilding, improving, and expanding voice and broadband services in Puerto Rico. The network performance factor should mirror the baseline service obligations proposed by the Commission – namely, download/upload speeds of at least 10/1 Mbps, with roundtrip latency of no greater than 100 milliseconds – although VPNet supports granting a small preference to bidders offering download/upload speeds of up to 25/3 Mbps.²² VPNet believes that speeds above 25/3 Mbps would require significant additional funding that would detract from the primary objectives of the Puerto Rico Fund and favor fiber deployment that will take much longer to deploy and will thereby delay the provision of baseline broadband in other areas. While network resiliency also should be considered by the Commission, VPNet cautions the Commission that this factor should only be applied objectively and in an evenhanded manner that is technologically neutral.

VPNet opposes allowing any package bidding.²³ Permitting bids to include more than one geographic area will needlessly complicate a competitive proposal process likely to involve only a limited number of applicants. Package bidding may be appropriate for large scale

²¹ See *id.* at ¶¶ 54-59.

²² See *id.* at ¶ 60. See also Section II.F, *infra*.

²³ See *id.* at ¶ 56.

auctions attracting numerous bidders, but it is not appropriate for a competitive proposal process awarding restoration funding.

Bids should be evaluated by the Wireline and Wireless Bureaus rather than the Universal Service Administrative Company.²⁴ Based on their involvement in vetting rural broadband experiment and CAF Phase II applicants, the Bureaus are best able to evaluate the financial and technical showings that should be part of the application process. For geographic areas that receive no bids, VPNet favors a second round of competitive proposals, perhaps with more lax eligibility requirements.²⁵ The Commission should encourage participation in the initial competitive process by not creating a second phase that is too lenient.

F. The FCC Should Adopt Service And Deployment Obligations

As discussed above, VPNet generally supports the download and upload speed and latency service obligation metrics proposed by the Commission, and also favors a minimum usage allowance of the higher of 170 GB per month or one that reflects the average usage of a majority of consumers.²⁶ Consistent with rules for the Commission's high-cost subsidy programs, VPNet also favors proposals to require Puerto Rico Fund recipients to offer broadband service in supported areas at rates that are reasonably comparable to rates offered for comparable services in urban areas.²⁷ VPNet believes that Puerto Rico Fund recipients should, as is the case with CAF Phase II support recipients, deploy at least forty percent by the third year of support, sixty percent by the fourth year of support, eighty percent by the fifth year of support, and complete deployment by the sixth year of support.²⁸

²⁴ See *id.* at ¶ 57.

²⁵ See *id.* at ¶ 58.

²⁶ See *id.* at ¶ 60.

²⁷ See *id.* at ¶ 62.

²⁸ See *id.* at ¶ 63.

Exercising oversight of the carriers that receive support is critical. To that end, VPNet agrees with the proposals put forth by the Commission to apply all reporting and certifications applicable to other CAF recipients contained in Part 54 of the Commission's Rules, and to otherwise monitor and oversee rebuilding, restoration and resiliency efforts on an ongoing basis.²⁹ Of particular importance, VPNet supports the Commission's proposal to monitor and reassess the deployment obligations of the awarded support before the end of the fifth year.³⁰ The Commission is correct in noting that long-term planning is and will remain a challenge in Puerto Rico, given the disruptive nature of natural disasters and the population shifts that ensue. The benefits of resetting deployment obligations midway through the funding term to address changed circumstances far outweigh any nominal uncertainty that may result.

VPNet disagrees, however, with any requirement that recipients must first obtain a letter of credit ("LOC") as the only avenue for providing the Commission with financial security.³¹ The expense and difficulty involved in obtaining a LOC can be extremely burdensome, especially for small providers, given the three-to-five percent annual cost of the LOC, the accounting requirement that LOCs are treated as debt on a company's balance sheet, and the lack of institutions that may be willing to provide LOCs to Puerto Rico-based broadband providers. Instead, as an alternative available to Puerto Rico Fund recipients, VPNet urges the Commission to allow support recipients to obtain a performance bond equal to the amount of support as a condition to obtaining support. The performance bond can be reduced over time as deployment milestones are met, thereby reducing the recipient's financial exposure without increasing the Commission's financial risk in case of a default. By affording recipients two paths to demonstrating security for federal support, recipients will have the flexibility to choose the

²⁹ See *id.* at ¶¶ 64-70.

³⁰ See *id.* at ¶ 67.

³¹ See *id.* at ¶ 69.

option that is best for their particular business needs while preserving the Commission's ability to mitigate its financial exposure if a recipient defaults.

III. THE COMMISSION SHOULD REQUIRE RECIPIENTS TO COMPLY WITH TARGETED DISASTER RESPONSE PROCEDURES

The Commission asks whether and to what extent Stage 2 Puerto Rico Fund recipients should be required to “storm-harden” their facilities to resist hurricanes and other natural disasters.³² Any standard should, of course, correspond to the technology or technologies proposed by the applicant and should be based on objective, independent standards. One such standard is the recently-released ANSI/TIA-222-H standard that became effective January 1, 2018.³³

As a condition of receiving Stage 2 support, a recipient should be required to use best efforts to participate in the Disaster Information Reporting System (“DIRS”), with the understanding that reporting may be impossible in cases where the recipient cannot access the internet in a timely manner because, for example, the upstream connection to the internet or the electrical grid is down.³⁴ Even when the internet connection is restored, recipients will (and should) be focused on restoring service to customers. Accordingly, recipients should have at least 60 days following restoration of a viable internet connection to file the first report with DIRS, and the Commission should not impose any sanctions if a recipient fails to meet this deadline for reasons reasonably beyond its control.

VPNNet also believes that recipients should be encouraged to voluntarily coordinate to reduce duplicative facilities and share infrastructure and costs where possible.³⁵ The

³² See *id.* at ¶ 91.

³³ See, e.g., *Revision H of ANSI/TIA-222 is Published* (Oct. 23, 2017), available at <http://www.aglmediagroup.com/revision-h-of-ansitia-222-is-published/> (last visited July 23, 2018).

³⁴ See *NPRM* at ¶ 92.

³⁵ See *id.* at ¶ 94.

Commission should, however, reserve the right to quickly respond to complaints if entities are not coordinating or cooperating to the detriment of Puerto Rico Fund recipients and their ability to meet deployment milestones is compromised.

Conclusion

For the foregoing reasons, VPNet largely supports the Commission's proposed approach to awarding of funding through the Uniendo a Puerto Rico Fund through a one-step, competitive process that credits expeditious deployment of resilient service at baseline speeds. The Commission should not give credit for speeds above 25/3 Mbps because that would divert finite support away to fewer locations. Applicants should bid for census tracts with no package bidding permitted. Recipients of support should be subject to performance obligations, build-out milestones, and reporting applicable to other CAF recipients.

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