



August 20, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Via Electronic Filing

Re: NOTICE OF EX PARTE
WC Docket No. 10-90: *Connect America Fund*
WC Docket No. 14-58: *ETC Annual Reports and Certifications*
WC Docket No. 07-135: *Establishing Just and Reasonable Rates for Local Exchange Carriers*
CC Docket No. 01-92: *Developing a Unified Intercarrier Compensation Regime*

Womble Bond Dickinson (US) LLP

1200 Nineteenth Street, NW
Suite 500
Washington, DC 20036

t: 202.467.6900
f: 202.467.6910

Bob Silverman
Senior Counsel
Direct Dial: 202-857-4532
Direct Fax: 202-261-0082
E-mail: Bob.Silverman@wbd-us.com

Dear Ms. Dortch:

On August 16, 2019, John Badal, CEO of Sacred Wind Communications, Inc. ("Sacred Wind") and Rachna Vas, Senior Executive Administrator for Sacred Wind, met with Federal Communications Commission ("FCC") Commissioner Geoffrey Starks and Michael Scurato, Acting Legal Advisor for Media and Consumer Protection to Commissioner Starks, during the Commissioner's visit to the To'Hajiilee Navajo Reservation and other Tribal communities in New Mexico to discuss the challenges of internet inequality, among other things. Also present at this meeting was Mark Begay, President, To'Hajiilee Navajo Chapter.

Sacred Wind's representatives and Commissioner Starks discussed the infrastructural development challenges that Sacred Wind faces in remote and rural Tribal areas, the rights of way processes as imposed by the Tribe, the U.S. Department of Interior Bureau of Indian Affairs and other jurisdictions, which increase the cost and time of deployment, and the disparity between the company and the FCC with respect to eligible locations in the census blocks in Sacred Wind's study area. Also discussed were Sacred Wind's recent FCC filings, including a petition for waiver and comments¹ pertaining to the FCC's second Alternative Connect America Model ("A-CAM II") containing a wide disparity in location data accuracy.

Moreover, Sacred Wind detailed its success in overcoming obstacles through the mixed uses of landline and wireless technologies and diligence in following the right of way process to conclusion. Also discussed was Sacred Wind's partnership with Microsoft Airband as an example of the company's pursuit of solutions to reach the most remote customers. Sacred Wind shared materials submitted with the aforementioned A-CAM II filings as well as a Sacred Wind article entitled "Basic Broadband for 'Homes' On Tribal Lands," right of way details for a To'Hajiilee fiber project, an August 2, 2018 letter from U.S.

¹ See *Connect America Fund; ETC Annual Reports and Certifications; Establishing Just and Reasonable Rates for Local Exchange Carriers; Developing a Unified Intercarrier Compensation Regime*, WC Docket No. 10-90, WC Docket No. 14-58, WC Docket No. 07-135, CC Docket No. 01-92, Petition for Waiver of Sacred Communications, Inc. (filed July 17, 2019) and *Connect America Fund*, WC Docket No. 10-90, Comments of Sacred Communications, Inc. (filed July 19, 2019).



Senators to Chairman Ajit Pai, a Microsoft Airband TV White Space Overview, and a Sacred Wind Airband brochure, copies of which are attached to this filing.

Pursuant to Section 1.1206 of the FCC's rules,² this *ex parte* communication is being filed electronically with the Office of the Secretary.

Best regards,

/s/ Robert A. Silverman

Robert A. Silverman
Counsel for Sacred Wind Communications, Inc.

Enclosures

cc: Geoffrey Starks (FCC)
Michael Scurato (FCC)
John Badal (Sacred Wind)

² 47 C.F.R. § 1.1206.