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September 11, 2019

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Notice of ex parte presentation - WC Docket No. 18-143*
The Uniendo a Puerto Rico Fund and the Connect USVI Fund

Dear Ms. Dortch:

On September 9, 2019, counsel to the Virgin Islands Telephone Corp. dba Viya and its affiliated companies in the United States Virgin Islands Robert W. Quinn of this firm and the undersigned met with Commission staff regarding the circulated draft order in the above-referenced proceeding.¹ Specifically, we met separately with Preston Wise from the Office of Chairman Ajit Pai and with the following staff from the Wireline Competition Bureau: Daniel Kahn, Ryan Palmer, Jesse Jachman, Alexander Minard, and Dangkhua Nguyen.

In the meetings, our presentation followed the attached talking points which were distributed to the meeting attendees.

This letter is filed consistent with the Commission's ex parte rules.

¹ See *The Uniendo a Puerto Rico Fund and the Connect USVI Fund, et al.*, Report and Order and Order on Reconsideration (draft), FCC-CIR1909-01 (rel. Sept. 5, 2019).

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Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/ L. Charles Keller

L. Charles Keller

*Counsel to Virgin Islands Telephone Corp. dba
Viya and its affiliated companies*

Attachment

cc: Preston Wise
Daniel Kahn
Ryan Palmer
Jesse Jachman
Alexander Minard
Dangkhoa Nguyen

Connect USVI Fund Draft Order
Virgin Islands Telephone Company dba Viya
September 9, 2019

- Strengthen resiliency and redundancy requirements
 - Weight core network miles more heavily than individual end-user connections and address end-user connections based on the number/percentage of locations served, rather than on aggregate miles of end-user connections
 - Core network miles affect potentially thousands of customers; storm-hardening them is more valuable than hardening individual customer lines/connections.
 - Aerial fiber on high-wind-rated composite poles should merit a lower point value than aerial cable on standard poles
 - Lightweight fiber on storm-resistant poles is much more resilient than heavy copper on standard poles
 - Provide point reduction for backup power at nodes and customer premises
 - Backup power is extremely important in both USVI and Puerto Rico
- Provide for a more thorough review to ensure parties making proposals actually can perform
 - Allow a single, brief public comment period (e.g., 14 days) on proposals
 - Given new, untested evaluation metrics, comment allows Commission to expand on its own engineering, operational, and financial evaluation capabilities
 - No collusion or confidentiality concerns because this is a single-round process
 - Brief cycle will cause no meaningful delay at this stage
 - Apply all Connect America Fund Phase II technical and financial qualification requirements to Connect USVI Fund process
 - No showing of lesser need for the requirements in this case
- Clarifications:
 - Buried cable
 - Leased facilities
 - Network diversity
 - Fixed wireless and microwave backhaul mileage