

WILKINSON) BARKER) KNAUER) LLP

1800 M STREET, NW
SUITE 800N
WASHINGTON, DC 20036
TEL 202.783.4141
FAX 202.783.5851
WWW.WBKLaw.COM

L. CHARLES KELLER
DIRECT 202.383.3414
CKELLER@WBKLAW.COM

September 16, 2019

VIA ECFS

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

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

Dear Ms. Dortch:

On September 12-13, 2019, Virgin Islands Telephone Corp. and its affiliated companies in the U.S. Virgin Islands (collectively, “Viya”) and its parent company ATN International Inc. (“ATN”) held meetings with Commissioners and their staff regarding the above-referenced proceeding. Specifically, on September 12, ATN and Viya met separately with Commissioner Brendan Carr and his legal advisor Joseph Calascione; Randy Clarke of the office of Commissioner Jeffrey Starks; and Travis Litman of the office of Commissioner Jessica Rosenworcel. On September 13, Viya met with Commissioner Michael O’Rielly and his legal advisor Arielle Roth. In all of the meetings, ATN and Viya were represented by Douglas J. Minster, Vice President Government and Regulatory Affairs, ATN; Geraldine Pitt, Chief Executive Officer, Viya; and outside counsel Robert W. Quinn of this firm and the undersigned

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.

Marlene H. Dortch, Secretary
September 16, 2019
Page 2

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*

cc: Hon. Michael O'Rielly
Hon. Brendan Carr
Arielle Roth
Joseph Calascione
Travis Litman
Randy Clarke

Attachment

Connect USVI Fund Draft Order
Virgin Islands Telephone Company dba Viya
September 12, 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