



September 17, 2019

**Via ECFS**

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

Re: Ex parte presentation – WC Docket No. 18-143  
*Uniendo a Puerto Rico Fund and Connect USVI Fund*

Dear Ms. Dortch:

Last week, representatives from Virgin Islands Telephone Corp. and its affiliated companies (“Viya”) met with representatives of the Federal Communications Commission (“FCC” or “Commission”)<sup>1</sup> regarding the Commission’s September 5, 2019 draft order in the above-referenced proceeding.<sup>2</sup> The Commission expects to vote on the Draft Order during its September 26, 2019 open meeting. In its meetings, Viya offered certain targeted modifications to the competitive proposal evaluation process proposed by the Commission in the Draft Order. These modifications are designed to better align the competitive proposal process with the Commission’s goals of creating incentives for the deployment and operation of resilient, hardened networks in the U.S. Virgin Islands (“USVI”) and Puerto Rico.<sup>3</sup> This letter further elaborates on, and provides specific recommendations regarding, the implementation of Viya’s proposals.

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<sup>1</sup> See Letter from L. Charles Keller, Counsel to Viya, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-143 (filed Sept. 11, 2019); Letter from L. Charles Keller, Counsel to Viya, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-143 (filed Sept. 16, 2019).

<sup>2</sup> *The Uniendo a Puerto Rico Fund and the Connect USVI Fund, et al.*, Report and Order and Order on Reconsideration (Draft), FCC-CIR1909-01 (Sept. 5, 2019) (“Draft Order”).

<sup>3</sup> See *id.* ¶ 3.

340-777-VIYA **Viya.vi**

**I. THE RESILIENCY AND REDUNDANCY REQUIREMENTS SHOULD BE STRENGTHENED TO BETTER ACHIEVE THEIR OBJECTIVES**

**A. The Scoring System Should Incentivize Hardening Network Miles That Serve the Most Customers**

To realize the Commission's goal of "award[ing] a point preference based on the level of resilience an applicant proposes to build into its network,"<sup>4</sup> the Commission should modify its proposed scoring mechanism to recognize that not all network miles contribute equally to network resiliency and path diversity. Specifically, the Commission should provide applicants with more credit for resiliency and path diversity investments in the central portions of their networks that serve many customers relative to more peripheral connections in the network that each typically serve only a single customer.

In all terrestrial networks, including both wireline and fixed wireless networks, any transmission will traverse facilities carrying aggregated traffic, such as network backbone transport and backhaul facilities ("Central Network" miles). Any transmission also will traverse an end-user connection ultimately dedicated to a single customer, such as a "last-mile" wireline customer drop or the transmission path between a fixed wireless access point and a customer's endpoint ("Peripheral Connection"). Peripheral Connections extend only relatively short distances from a network's final points of aggregation (e.g., remote terminals or wireless access points) ("Final Aggregation Facility") to the premises of each of the multiple customers served by the Final Aggregation Facilities.

Although the Peripheral Connections serving the customer locations comprise only a small portion of the network path traversed by a transmission to or from that customer, all of the individual Peripheral Connections in the aggregate comprise the vast majority of the total network miles of a typical terrestrial network. This is because the combined distances of the Peripheral Connections are much greater than the combined distances of Central Network miles between the core of a network, its switches, and its Final Aggregation Facilities. Despite this, the overwhelming majority of the route traversed by transmissions to and from a single customer is composed of Central Network miles serving hundreds or thousands of customers and the Peripheral Connection serving the single customer is only a very small portion of the route.

To demonstrate this point, consider the portion of a typical terrestrial fixed network that serves 500 customer locations. The network has a Final Aggregation Facility that serves these 500 customers, such as a wireline network node or fixed wireless access point. Assume that the Final Aggregation Facility is served by a five-mile backhaul circuit extending to the closest switching facility. If each of the 500 individual customer Peripheral Connections served by the Final Aggregation Facility is, on average, one thousand feet from the facility, this portion of terrestrial fixed network is composed of five network miles that carry aggregated traffic for 500 customers (i.e., the backhaul circuit between the switch and the Final Aggregation Facility), and approximately 95 network miles of Peripheral Connections carrying traffic from the Final Aggregation Facility to individual customer locations.<sup>5</sup> Of this 100 total network miles, 95

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<sup>4</sup> *Id.* ¶ 28.

<sup>5</sup> 500 Peripheral Connections times 1000 feet per connection equals 500,000 feet. 500,000 feet divided by 5,280 feet per mile equals approximately 94.7 miles of Peripheral Connections.

percent of the miles would be Peripheral Connections.<sup>6</sup> Nevertheless, the transmission path to and from each individual customer's location is more than 95 percent composed of aggregated portions of the network—i.e., between the Final Aggregation Facility and the closest switch—and only five percent composed of Peripheral Connection. Thus, the sheer number of individual Peripheral Connections cause them to represent a dramatically over-sized percentage of total network miles in a fixed terrestrial network even though they represent only a small portion of the overall transmission path to and from a customer.

Moreover, while Peripheral Connections are certainly relevant to network resiliency, hardening any given Peripheral Connection will have a significantly lower impact on the network's ability to survive a disaster than a comparable investment in hardening Central Network miles. If any single Peripheral Connection is severed, such as if a wireline drop is damaged by a falling tree or a wireless endpoint is blown off of a customer's roof, only the customer served by that Peripheral Connection will lose service. By contrast, if a backhaul circuit between a switch and a Final Aggregation Facility is severed, all of the potentially hundreds of customers served by that backhaul circuit will lose service. For the same reason, the establishment of path diversity for Peripheral Connections has less resilience impact than creating incentives that stimulate path diversity for Central Network miles. Path diversity at a Peripheral Connection benefits a single customer, whereas Central Network path diversity will benefit hundreds or thousands of customers.

Under the scoring system in the Draft Order, however, all network miles are treated the same. As a result, Peripheral Connections are substantially overweighted relative to their actual role in securing network resiliency or accomplishing path diversity because the vast majority of resiliency and path diversity scoring effectively is devoted to Peripheral Connections rather than aggregated transport facilities. By weighting all network miles the same, the Draft Order's resiliency scoring system incentivizes applicants to submit proposals to improve resiliency and path diversity wherever it is least expensive to do so, which often will be Peripheral Connections given the outsized total number of miles of Peripheral Connections, rather than in the Central Network where it is most effective to do so.

Instead, the Draft Order should incentivize applicants to devote resources to improving the resiliency and path diversity of Central Network miles because this will accomplish the greatest benefit to the greatest number of customers per dollar spent. The Commission can realign the incentive structure by modifying the resiliency scoring system to resiliency and redundancy investments in Central Network Miles more heavily than in Peripheral Connections.

To create an appropriate incentive for applicants to commit to invest Stage 2 funds to maximize the resilience and path diversity of their networks, the scoring weight of Central Network Miles should be significantly higher than the weight provided to Peripheral Connections. Viya proposes to devote three-quarters of the resiliency and path diversity score to Central Network Miles and one quarter to Peripheral Connections. In addition, to substantially simplify the resiliency and path diversity calculation for Peripheral Connections, Viya proposes to measure the resiliency of Peripheral Connections based on the number of locations that they serve, rather than on the length of those Peripheral Connections.

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<sup>6</sup> The 100 network miles is composed of five miles of backhaul from the Final Aggregation Facility to the nearest switch and the aforementioned 95 miles of Peripheral Connections.

To implement this proposal, Viya proposes the following approach:

**Central Network Miles.** The Commission should define the term “Central Network Miles” to refer to the combined distance of all aggregated transport facilities upstream of the Final Aggregation Points in a network. Thus, Central Network Miles will run from the core of the network and its switching facilities to the remote terminals in a wireline network or the wireless access points in a fixed wireless network, but Central Network Miles will not include Peripheral Connections. To create the appropriate incentives for investment in the resiliency of Central Network Miles, 75 percent of an applicant’s resiliency score (i.e., 45 of the 60 points in the resiliency category) should be based on whether the applicant’s Central Network Miles facilities are buried, are mounted on wooden or composite poles (as further discussed below), or utilize fixed wireless technology such as microwave backhaul.<sup>7</sup> Further, to the extent an applicant determines to reduce its redundancy score through path diversity, 75 percent of its path diversity score (i.e., 15 of the 20 possible path diversity points) should be based on whether Central Network Miles have path diversity.<sup>8</sup>

**Peripheral Connections.** The other 25 percent of an applicant’s resiliency and path diversity score should be devoted to Peripheral Connections, which the Commission should define to include all network facilities beyond a Final Aggregation Point. Further, the Commission should score the resiliency and path diversity of Peripheral Connections based on the percentage of locations served, rather than by the percentage of the total miles of Peripheral Connections served.<sup>9</sup> This appropriately weights the value of investment in hardening such connections, and also avoids the potentially complicated task of measuring the distance of tens of thousands of Peripheral Connections in the USVI and millions of Peripheral Connections in Puerto Rico. It also avoids the need to determine how to measure the distance of fixed wireless Peripheral Connections.<sup>10</sup>

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<sup>7</sup> For networks comprised of multiple types of plant, the proportional scoring calculations would be conducted in the same manner described in the Draft Order, but it would be conducted separately for Central Network Miles and Peripheral Connections. The Central Network Miles proportional calculation would be multiplied by 0.75. Using the proportional example set forth in the Draft Order (but applied only to Central Network Miles), where a proposal includes Central Network Miles consisting of 70 percent buried fiber, 20 percent fixed wireless (e.g., primary microwave backhaul), and 10 percent aerial deployment, the 14 resulting points would be multiplied by 0.75 to determine the Central Network Miles resiliency score of 10.5. A similar calculation would then be conducted for Peripheral Connections based on the percentage of locations served by each such technology, with the resulting Peripheral Connection resiliency score multiplied by 0.25. The total resiliency score would be composed of the sum of the Central Network Mile resiliency score plus the Peripheral Connection resiliency score.

<sup>8</sup> Viya proposes to bifurcate the path diversity calculation between Central Network Miles and Peripheral Connection locations in the same manner as the resiliency score: 75 percent of the path diversity score should apply to Central Network Miles and 25 percent to Peripheral Connections (based on a percentage of locations). However, if an applicant chooses to rely on network diversity (i.e., the availability of a back-up network), rather than path diversity, to accomplish redundancy, network diversity should be calculated exclusively based on the percentage of individual locations served by a back-up network. See *id.* ¶ 32. Accounting for a backup network on a per-customer basis is most consistent with the redundancy benefit that a backup network provides.

<sup>9</sup> This is consistent with the approach that the Commission proposes to use for satellite networks. See *id.* ¶ 31.

<sup>10</sup> However, applicants will still need to measure the distance of fixed wireless Central Network Miles for purposes of calculating the resiliency and path diversity scores for these miles. Consequently, the Commission should specify in the Draft Order how such miles should be measured by applicants. For example, the Commission should specify that Central Network Miles provided over fixed wireless or microwave backhaul facilities should be measured based on

## **B. The Commission's Resiliency Scoring System Should Recognize the Benefits of Composite Poles**

The Commission's scoring mechanism will create better incentives for the deployment and operation of more resilient networks if it recognizes that not all aerial facilities are equally vulnerable in hurricanes. Composite poles are far more resilient than wooden poles<sup>11</sup> and therefore network facilities attached to composite poles should be scored differently than wooden poles. The Federal Emergency Management Agency ("FEMA") recognized the benefits of composite poles when it allocated funds for the reconstruction of the USVI's electric power distribution grid following Hurricanes Irma and Maria. FEMA provided the USVI's electric power utility significant funding for "replacing damaged wooden utility poles with more resilient composite fiberglass poles that can withstand 200 mile per hour winds."<sup>12</sup>

The Draft Order, however, would not take these differences into account. Specifically, the Draft Order would assign 60 points to "aerial wireline deployment," without regard to what kind of poles are used.<sup>13</sup> It also would assign only 40 points for "fixed wireless" deployments—even if they are placed on vulnerable wooden poles.<sup>14</sup>

To provide more appropriate incentives for network hardening, applicants using composite poles for their aerial infrastructure should not receive the same 60-point scoring

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the straight-line map distance between each antenna pair without, for example, taking into account changes in elevation between end points on each such transmission path.

<sup>11</sup> See, e.g., Mary Lou Jay, *Rolling with the Punches*, Composites Manufacturing (Sept. 1, 2018), <http://compositesmanufacturingmagazine.com/2018/09/rolling-with-the-punches/> (discussing the benefits of composite poles over wooden poles generally and noting that "[i]n the Grand Bahamas, hurricanes in 2011 and 2015 took out 2,700 wooden poles, but all 450 composite poles the utility had installed remained intact"); Dan Coughlin, *Weathering the Weather: The Benefits of Composite Utility Poles in Storm Zones*, Electric Energy Online (July/Aug. 2018), <https://electricenergyonline.com/energy/magazine/1148/article/Weathering-the-Weather-The-Benefits-of-Composite-Utility-Poles-in-Storm-Zones.htm> (discussing the "litany of recent evidence" of the benefits of composite poles "in storm zones across the continent," including that "Hurricane Matthew and the 100-Year Ice Storm destroyed 2,700 and 1,600 wooden poles, respectively, in October 2016 and January 2009, while the composite poles in Florida and Texas were left unscathed"); Sriram Kalaga, *Composite Transmission and Distribution Poles: A New Trend*, Energy Central (Oct. 16, 2013), <https://www.energycentral.com/c/tr/composite-transmission-and-distribution-poles-new-trend> (highlighting "advantages and issues related to composite transmission poles," including "their ability to withstand heavy wind loads and impacts"); Utility Products, *Composite Poles Prove to be Solution Providers for Utilities* (June 22, 2015), <https://www.utilityproducts.com/home/article/16002508/composite-poles-prove-to-be-solution-providers-for-utilities> ("The strength and wind tolerance of composite poles have made them a good application for storm hardening. Utilities have used the poles to harden the grid and to prevent cascading of poles.").

<sup>12</sup> GAO, *U.S. Virgin Islands Recovery, Status of FEMA Public Assistance Funding and Implementation*, at 16 & Fig. 8 (Feb. 2019), <https://www.gao.gov/assets/700/697059.pdf> ("FEMA's obligations for permanent work also included funding for hazard mitigation measures to reduce the risk of damage during future storms—for example, by replacing wooden utility poles with composite fiberglass poles."); see also FEMA, *U.S. Virgin Islands One-Year Milestones* (Sept. 20, 2018), <https://www.fema.gov/news-release/2018/09/20/us-virgin-islands-one-year-milestones> ("The territory is working to improve the grid resilience for future events. This investment of nearly \$500 million, funded through the FEMA Public Assistance program, includes replacing wooden poles identified to support critical infrastructure with composite poles that can withstand winds of up to 200 mph on all three islands.").

<sup>13</sup> Draft Order at ¶ 33 & Table 5.

<sup>14</sup> *Id.*

weight as applicants placing infrastructure on more vulnerable wooden poles.<sup>15</sup> Instead, in light of the greater resiliency of composite poles, the Commission should apply a score of 40 to aerial wireline facilities and fixed wireless facilities placed on composite poles.

**C. The Commission's Resiliency Scoring Criteria Should Recognize the Important Benefits of Backup Power**

Hurricanes Irma and Maria demonstrated that backup power is an important network resiliency consideration. A network that can remain operable for some period of time following the loss of commercial power during a storm or other natural disaster provides far greater benefits to the public than network infrastructure that is rendered inoperable by a power outage despite remaining physically intact. Importantly, this includes public safety benefits that can save lives. The ability of the public to communicate during the immediate aftermath of a storm enables first responders to locate victims, determine their needs, and direct medical, rescue, and recovery operations. It also enables storm victims to communicate their conditions and whereabouts to friends and family members. Moreover, backup power enables communications infrastructure to remain viable during the frequent power outages that plague the USVI and Puerto Rico, both of which have less reliable electric utilities than the U.S. mainland.<sup>16</sup>

For these reasons, the Commission should provide a 20-point reduction for proposals that provide:

- at least eight hours of backup power in all network components controlled by the applicant (e.g., switches, nodes, endpoints); and
- at least eight hours of backup power at all customer locations at no charge to the customer.

This point reduction should be subtracted from an applicant's total resiliency and redundancy score, which can be a maximum of 80 points under the Draft Order's currently proposed 270-point scale.<sup>17</sup>

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<sup>15</sup> Fixed wireless facilities, such as fixed wireless access points, that are mounted on wooden poles should receive the same 60-point resiliency score applicable to aerial wireline facilities mounted on wooden poles. Such fixed wireless facilities are no more resilient than the wooden poles on which they are attached.

<sup>16</sup> Ernice Gilbert, *WAPA Says It's Having Trouble Restoring Power-Generating Units, Prolonging All-Day, Island-Wide Outage On St. Croix*, The Virgin Islands Consortium (Sept. 15, 2019), <https://viconsortium.com/news-2/wapa-says-its-having-trouble-restoring-power-generating-units-prolonging-all-day-island-wide-outage-on-st-croix/>; Ernice Gilbert, *New York Power Authority Discusses Developing Solutions To Reoccurring Power Outages With WAPA Officials*, The Virgin Islands Consortium (Sept. 14, 2019), <https://viconsortium.com/virgin-islands-2/new-york-power-authority-discusses-developing-solutions-to-reoccurring-power-outages-with-wapa-officials/>; see, e.g., Erin Ailworth & Arian Campo-Flores, *Weary of Power Outages, Puerto Ricans Find Solace in Solar*, Wall St. J. (Sept. 21, 2018), <https://www.wsj.com/articles/weary-of-power-outages-puerto-ricans-find-solace-in-solar-1537531200>.

<sup>17</sup> See Draft Order ¶ 14 & Table 1. Alternatively, the Commission could provide for 20 points for applicants not proposing to meet these backup power criteria, bringing the total possible points to 290.

**D. The Commission Should Clarify Other Aspects of its Resiliency Scoring Process**

For greater clarity in how proposals will be scored, the Commission should clarify certain additional aspects of its scoring calculation. First, the Commission should make clear that applicants relying for purposes of their proposals on leased facilities and other inputs that they do not own must demonstrate that the applicants' underlying facility leases, and their access to inputs that they do not own, extends over the full ten-year term of support. This should include buried fiber leased from a third party, as well as access to spectrum resources to be used for fixed wireless Peripheral Connections or microwave backhaul.

In addition, the Commission should clarify that all types of underground cable—not only fiber—qualifies for the scoring benefit for undergrounding.<sup>18</sup> The point value for undergrounding cable is based on the resiliency of buried wires. Any potential network performance benefit from the use of fiber over, for example, coaxial cable already is accounted for in the network performance scoring system.

**II. THE COMMISSION SHOULD ENSURE THAT APPLICANTS WILL SATISFY THEIR PROPOSAL COMMITMENTS**

**A. The Commission Should Seek Public Comment on Applicants' Proposals**

The Commission would benefit from permitting a single, brief round of public comment on technical aspects of the proposals. A comment round of 7 to 14 days is sufficient and no reply comment period is necessary. Also, this comment round does not need to extend to the price per location proposed by applicants, which could remain confidential. The FCC will greatly benefit from the input of applicants [third parties? Or is this limited to applicants only?], who are knowledgeable about the real-world conditions in, and challenges of deployments inherent to, the USVI and Puerto Rico.

The Draft Order currently declines to adopt such a comment round. It asserts that a comment round would “add unnecessary delay,” would be inconsistent with the prohibition on communications among applicants, and would have no “impact on the Bureau’s application of objective scoring criteria”.<sup>19</sup> As an initial matter, a brief, 7 to 14 day comment round would interpose no meaningful delay compared to the benefit to the FCC of input from local experts. Second, the Commission’s single-round application process ensures that there can be no collusion or confidentiality concerns because applicants will have no opportunity to amend their proposals in any substantive way after they have been submitted.<sup>20</sup>

Third, as the discussion in the first section of this letter demonstrates, the scoring criteria may be difficult to apply objectively.<sup>21</sup> The Commission does not typically award universal

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<sup>18</sup> See *id.* ¶ 33 & Table 5 (proposing potentially 0 points for “underground fiber”).

<sup>19</sup> *Id.* ¶ 37.

<sup>20</sup> See *id.* ¶ 40.

<sup>21</sup> The Commission effectively recognizes this when requiring the Wireline Competition Bureau to assign two separate and independent reviewers to score each proposal. See *id.* ¶ 41. Although the Commission states that it “expect each reviewer to obtain the same score for the same application,” it effectively is acknowledging that this may not be the case. However, the Commission is unclear what steps should be taken by the Bureau if the two reviewers’ scores for a proposal markedly differ by a non-trivial amount.

service support through a multi-criteria competitive proposal process with a single “one and done” bidding round, and this funding allocation structure substantially raises the stakes in connection with the Commission’s review and scoring of proposals. Evaluating each applicants’ conformance to the various scoring criteria, and in particular the resiliency and redundancy criteria, may present novel challenges for Commission staff. There is a significant amount of complex technical and policy decision-making that may be required to fairly and uniformly apply the Draft Order’s scoring criteria to different providers and network architectures. Further, conditions in the USVI and Puerto Rico are unusual. As a result, the Commission’s engineering staff may benefit from input from local providers aimed at identifying potential deficiencies in proposals that are specific to the unique conditions in these Territories.<sup>22</sup>

## **B. The Commission Should Impose CAF Phase II Technical and Financial Qualifications**

Applicants for Stage 2 funding should be subject to the same rigorous pre-screening process as CAF Phase II applicants.<sup>23</sup> It is extremely important that the applicant selected by the Commission is able to satisfy all of the commitments in its proposal because the Draft Order does not contemplate any measures after the award of support that will be sufficient to ensure service to the people of the Territories if a selected provider fails to perform. Provisions permitting the reclamation of support by the FCC will be of little benefit to residents and businesses in the Territories that may be left without adequate service if a winning applicant defaults during buildout.

Further, awarding support to the second-place bidder if the initially winning bidder promptly defaults<sup>24</sup> may be an effective strategy during the period immediately after the application process is complete, but it is unlikely to be a viable solution later during the term of support. At that stage, potentially several years after support initially is awarded, the second-place bidders’ business plans and investment strategies are likely to have changed. The second-place bidder cannot be expected to maintain adequate resources in reserve to step in at some unknown point in the future to rectify the disruption to residents resulting from a performance failure by the initially winning bidder

The draft order’s rationales for reducing the financial and technical qualification showings to something less than the CAF Phase II criteria are insufficient given the risk involved. The eligibility “requirement for prior service in the territory” is minimal.<sup>25</sup> The Draft Order permits applicants to participate in the Stage 2 application process even if (i) they previously have served only one location in a Territory, (ii) they never have previously provided residential service, or (iii) they have never provided voice service.<sup>26</sup> Further, the draft modifies the Territory-presence requirement (based on FCC Form 477 filings) from June 2017 to June 2018, which enables an entity that has provided service in the Territories for less than two

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<sup>22</sup> Whether or not the Commission provides for public comment, it must ensure that the proposals are evaluated by staff with expertise in evaluating the feasibility of parties’ network proposals.

<sup>23</sup> See *id.* ¶ 41 & n.140. *Connect America Fund Phase II Auction Scheduled for July 24, 2018 Notice and Filing Requirements and Other Procedures for Auction 903*, Public Notice, 33 FCC Rcd 1428, 1446-58 (2018).

<sup>24</sup> Draft Order ¶ 316.

<sup>25</sup> See *id.* n.140.

<sup>26</sup> See *id.* ¶¶ 46-49.



years, and only after the hurricanes, to qualify.<sup>27</sup> Thus, in the USVI for example, a provider will be eligible to apply to serve all of the tens of thousands of locations on St. Croix or on St. Thomas and St. John even if the provider previously only provided broadband-only service to a single customer in a single location in the USVI for less than two years and only after the hurricanes.

Moreover, any concern that stricter financial and technical qualification standards will reduce participation in the proposal process or limit competition among applicants seem misplaced. Any such concerns are fully offset by the increased confidence in the applicant pool that the imposition of the CAF Phase II qualification standards. The fundamental purpose of screening applicants is to ensure that only qualified bidders [, who fully understand their commitments and obligations,] submit a proposal. If fair and reasonable screening criteria, like the CAF Phase II qualifications standards, reduce the number of applicants by eliminating those who cannot demonstrate that they possess the ability to satisfy program requirements and their proposed service commitment, the screening criteria achieved their intended purposes—limiting the applicant pool to qualified applicants and thereby reducing the risk of default.

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Viya reiterates its appreciation and gratitude for the Commission's continued efforts to ensure that the residents and businesses in the USVI and Puerto Rico have access to advanced and resilient broadband services. Viya agrees that the Territories' residents and businesses require such access to continue to rebuild, and thereafter to maintain and grow, the economies and infrastructure of the USVI and Puerto Rico. The residents of the Territories ultimately should have the same opportunities as U.S. citizens on the mainland. The proposals in this letter are intended to build upon the Commission's good work in the Draft Order and to advance the goals that the Commission seeks to achieve with the Connect USVI Fund and the Uniendo a Puerto Rico Fund.

Sincerely,

/s/ Geraldine Pitt

Geraldine Pitt  
Chief Executive Officer  
Virgin Islands Telephone Corp. dba Viya

cc: Hon. Ajit Pai, Chairman  
Hon. Michael O'Rielly  
Hon. Brendan Carr  
Hon. Jessica Rosenworcel  
Hon. Jeffrey Starks  
Nicholas Degani  
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Arielle Roth

Joseph Calascone  
Travis Litman  
Randy Clarke  
Kris Monteith  
Daniel Kahn  
Jesse Jachman  
Ryan Palmer  
Alexander Minard

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<sup>27</sup> *Id.* ¶ 47.