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**VIA ELECTRONIC FILING**

November 2, 2018

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Rm. TW-A325  
Washington, DC 20554

**Re: *Ex Parte*, Uniendo a Puerto Rico Fund and the Connect USVI Fund, Connect America Fund, ETC Annual Reports and Certifications, WC Docket Nos. 18-143, 10-90 and 14-58**

Dear Ms. Dortch:

On October 12, 2018, Puerto Rico Telephone Company, Inc. ("PRTC") filed an *ex parte* submission (the "October 12 Letter") providing data to assist the Commission as it decides the appropriate budget for fixed providers in the Uniendo a Puerto Rico Fund ("Uniendo Fund") as well as how best to structure Stage 2 for fixed providers in the above referenced proceedings.<sup>1</sup> PRTC, by its attorneys, hereby supplements the Exhibit to the October 12 Letter.

The October 12 Letter included an Exhibit prepared by David Blessing of Parrish Blessing & Associates, a consultant for PRTC. The Exhibit is an Excel file that, using the Commission's CAM Model, includes the projected reserve price and support amounts under the Uniendo Fund using the Commission's CAM Model. The support amounts in the Exhibit, although calculated at the census block level pursuant to the CAM Model, are presented as rolled-up to the municipio level.

By this *ex parte*, PRTC submits a revised Exhibit that includes the support amounts rolled-up to the municipio level as well as the support calculated at the census block level. The purpose of providing the revised Exhibit is to demonstrate to the Commission the feasibility of rolling up to the municipio level support that is calculated at the census block level.

PRTC's proposed methodology calculates the amount of support that would flow to each census block based on the FCC determined funding budget, the existence of a competitive fixed broadband provider and a \$200 per location funding cap.<sup>2</sup> The methodology adjusts the lower cost benchmark to the level that will distribute 100 percent of the budgeted support. The

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<sup>1</sup> Puerto Rico Telephone Company, Inc., *Ex Parte*, Uniendo a Puerto Rico Fund and the Connect USVI Fund, Connect America Fund, ETC Annual Reports and Certifications, WC Docket Nos. 18-143, 10-90 and 14-58, filed October 12, 2018 ("October 12 Letter").

<sup>2</sup> The calculations are based on publicly available CAM v4.2 cost estimates that are rounded to the nearest \$5. PRTC recognizes that the Commission may have access to more precise estimated cost data.

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support by census block is then rolled up the municipio level. The analysis presents four scenarios based on two annual support amounts (the \$44.5 million proposed by the Commission and \$98 million level proposed by PRTC) and whether a census block with a fixed broadband competitor is eligible for support. The results of the analysis show that the proposed methodology allows for the efficient targeting of support based on Commission determined budget and eligibility criteria.

Due to the 25 MB size limitation with the Commission's Electronic Comment Filing System (ECFS), the Exhibit is being submitted in two separate filings.

Should you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ Edgar Class

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*Counsel for Puerto Rico Telephone Company, Inc.*

Enclosure

cc: Alexander Minard  
Rebekah Douglas  
Christian Hoefly  
Talmage Cox