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September 24, 2014

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**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

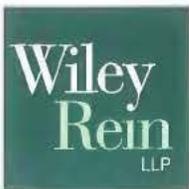
Re: *Universal Service High-Cost Filing Deadlines;  
Petition of Virgin Islands Telephone Corp. d/b/a Innovative Telephone for  
Waiver of the National Exchange Carrier Association Adjustment Period,  
WC Docket 08-71, CC Docket No. 96-45*

Dear Ms. Dortch:

On September 24, 2014, in connection with the above-referenced proceedings, Shawn O'Donnell, Chief Executive Officer of the Virgin Islands Telephone Corp. d/b/a Innovative Telephone ("Innovative"), Don Parrish with Parrish, Blessing & Associates, and the undersigned with Wiley Rein LLP, counsel for Innovative, met with Daniel Alvarez, the Chairman's Legal Advisor – Wireline, Public Safety, and Homeland Security, and Alex Minard with the Wireline Competition Bureau.

During this meeting, Innovative discussed its petition for a waiver of the National Exchange Carrier Association's rolling 24-month adjustment period, which would ensure that the company's high cost loop support for 2011 and Connect America Fund ("CAF") frozen support would be calculated based on accurate loop count data. Innovative underscored the significance of the waiver, which, if granted, would result in increased annual support to Innovative in the amount of \$565,860 in increased high cost support in 2011 and annual frozen CAF support. Innovative also explained that, apart from the waiver, USAC should recalculate the company's baseline support amount based on accurate loop counts for November and December 2011, which would result in \$113,172 in increased annual frozen CAF support.

Finally, Innovative answered questions regarding its network modernization program in the United States Virgin Islands and its efforts to increase broadband adoption in the Territory.



Ms. Marlene H. Dortch  
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Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced dockets.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bennett L. Ross", written over the word "Sincerely,".

Bennett L. Ross

BLR:rw

cc: Daniel Alvarez  
Alex Minard