



October 29, 2015

VIA ECFS

Marlene Dortch, Secretary
Federal Communications Commission
Washington, DC 20554

Re: Ex Parte Notice
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support, WC
Docket No. 09-197; Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On behalf of Atlantic Tele-Network, Inc. and its subsidiaries and affiliates (collectively, "ATN"), and pursuant to Section 1.1206(b) of the Commission's Rules, this *ex parte* notice is being filed in the above-referenced dockets to report an oral *ex parte* meeting occurring on Tuesday, October 27, 2015. Present at the meeting on behalf of ATN were: Douglas Minster, G. Wade McGill and Rohan Ranaraja. Present on behalf of the Commission were: Trent Harkrader, Jay Schwartz and Nathan Egan of the Wireline Competition Bureau.

At the meeting, ATN reiterated the points made earlier in the comments filed by NTUA Wireless, LLC, and jointly by Commnet Wireless, LLC and Choice Communications, LLC, each an affiliate of ATN. In particular, ATN reiterated: (1) the need for Lifeline support for broadband service in extremely rural, tribal and insular areas and urged the Commission to refrain from adopting a "one size fits all" approach to minimum service standards associated with broadband Lifeline services; (2) the need for amending Section 54.413(a)(1) of the Commission's Rules to eliminate disparate treatment of identically-situated facilities-based wireless providers delivering Lifeline service in tribal areas; and (3) the need for adopting a third party verification process that is "real time" to ensure that the Lifeline enrollment process is not

unduly and unfairly burdensome for potential customers in extremely rural and tribal areas who must travel long distances to conduct business, including obtaining Lifeline-supported service.

Please direct any questions you may have to the undersigned. Thank you.

Sincerely,

/s/ Douglas J. Minster
Vice President, Government &
Regulatory Affairs

cc (via e-mail):
Trent Harkrader
Jay Schwartz
Nathan Egan