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November 4, 2015

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EX PARTE PRESENTATION

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

Re: Sandwich Isles Communications, Inc., Petition for Declaratory
Ruling, WC Docket No. 09-133

Dear Ms. Dortch:

On November 3, 2015, on behalf of the National Exchange Carrier Association, Inc. ("NECA"), Regina McNeil, General Counsel of NECA, and I spoke with Stephanie Weiner, Senior Legal Advisor, Wireline, to Chairman Wheeler, and Matthew S. DelNero and Deena Shetler of the Wireline Competition Bureau, with respect to the above-captioned matter.

NECA summarized the position of NECA as expressed in the Petition for Clarification/Declaratory Ruling it filed in this docket in February 2015. NECA indicated that the NECA traffic sensitive pool payments continued to compensate Sandwich Isles Corporation ("SIC") for lease costs of the Paniolo undersea cable that were not paid for by SIC. Even without compensation for non-paid Paniolo undersea cable lease costs, SIC would continue to receive sizable net payments from the traffic sensitive NECA pool.

I urged that the Commission promptly issue a ruling with respect to NECA's Petition for Clarification/Declaratory Ruling. Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced docket.

Sincerely,

/s/ Gregory J. Vogt

Gregory J. Vogt
Counsel for National Exchange Carrier Association, Inc.

cc: Stephanie Weiner
Matthew S. DelNero
Deena Shetler