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November 2, 1998

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: American Samoa Government and American Samoa
Telecommunications Authority Petition for Waivers and
Declaratory Rulings to Enable American Samoa to
Participate in the Universal Service High Cost Support
Program and the NECA Pools and Tariffs,
CC Docket No. 96-45; AAD/USB File No. 98-41**

Dear Ms. Salas:

On behalf of the American Samoa Telecommunications Authority ("ASTCA"), Roger Peterson of Communications Strategies, L.L.C., consultant to ASTCA, and I made an *ex parte* presentation regarding the proceedings referred to above in a telephone conversation on Friday afternoon, October 30, with Katie King and Robert Loube of the Accounting Policy Division, Common Carrier Bureau. We discussed the methodology used to convert ASTCA's accounts to a Part 32 system, ASTCA's eligibility to become an average schedule company, and cost data that would be helpful to the Commission's decisionmaking. If you have any questions, please contact me.

Respectfully submitted,



David L. Sieradzki
Counsel for the American Samoa
Telecommunications Authority

cc: Katie King
Robert Loube

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