

COMSTOCK CONSULTING LLC

October 15, 2008

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

**Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45; and
High Cost Universal Service Support, WC Docket No. 05-337**

Dear Ms. Dortch:

Yesterday Michael Small, Tony Wolk, William Roughton, and Omar Martinez of Centennial Communications, Edwin Quinones, Counsel to Centennial in Puerto Rico, The Honorable Kenneth McClintock-Hernandez, President of the Senate in Puerto Rico, Eric Lausten from the Washington DC office of the Governor of Puerto Rico, and the undersigned met with Chairman Kevin Martin to discuss universal service reform and its impacts on Puerto Rico.

Centennial and Mr. McClintock-Hernandez advocated positions that they had previously made in filings in the above referenced dockets. In particular, they spoke of the need for the FCC to recognize in any reform it might undertake the higher costs and lower income levels in Puerto Rico, and the serious adverse impacts that elimination of ICLS funds would have on the provision of service in Puerto Rico. Centennial and Mr. McClintock-Hernandez also reiterated their mutual support for the FCC taking affirmative action to create an insular mechanism in line with that filed by the Puerto Rico Telephone Company in its May 6, 2005 White Paper in Docket 96-45.

Respectfully,

/s/ Earl Comstock

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