

Minority Media and Telecommunications Council

3636 16th Street N.W., Suite B-366
Washington, D.C. 20010
Phone: 202-332-0500 Fax: 202-332-0503
www.mmtconline.org

April 1, 2010

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

RE: Federal-State Joint Board on Universal Service, High Cost Universal Service Support
(CC Docket No. 96-45 and WC Docket No. 05-337)

Dear Ms. Dortch:

This reports on a meeting March 31 with Commissioner Meredith Attwell Baker and Christi Shewman, Legal Advisor, a meeting yesterday with Rosemary Harold, Legal Advisor to Commissioner Robert McDowell, and a telephone call yesterday with Jennifer Schneider and John Giusti, Legal Advisors to Commissioner Michael Copps. I provided (by hand and/or e-mail) these materials in the dockets: MMTC Letter of March 25, 2010; MMTC et al. letter of March 27, 2006, MMTC et al. Comments of March 27, 2006 and MMTC et al. Reply Comments of May 27, 2006. I made these points:

- Insular support remains critical to Puerto Rico, as many in Puerto Rico still lack access to basic telephone and Internet services that the rest of the U.S. takes for granted. Telephone and broadband penetration rates in Puerto Rico are significantly lower than the national average.
- Costs for deployment in Puerto Rico are much higher than costs for urban areas on the mainland, due to weather, shipping, climate, poverty, skilled labor and local cost of living issues.
- Section 254(b)(3), from the 1996 Act, remains unfulfilled even after the 2005 NPRM's finding that Puerto Rico should receive insular support. The unresolved question of defining a non-rural insular area can be resolved later if necessary.
- Puerto Rico has the largest unserved population in the United States – about 200,000. The cost of such support is minimal relative to the urgent need, and USF reform can rationalize those costs.
- This is at bottom a civil rights issue. A decision to deny relief to Puerto Rico would be inconsistent with the National Broadband Plan's priority for service to the unserved, and it would impose enormous costs on the people of Puerto Rico and the nation in the form of unfulfilled human and economic potential.

Respectfully submitted,

David Honig

David Honig
President and Executive Director

Attachments