



**Minority Media &
Telecom Council**

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October 19, 2011

Hon. Julius Genachowski, Chairman
Hon. Michael Copps, Commissioner
Hon. Robert McDowell, Commissioner
Hon. Mignon Clyburn, Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Dear Chairman Genachowski and Commissioners:

Re: Universal Service Reform (Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Lifeline and Link-Up, WC Docket No. 03-109) (ex parte)

MMTC supports the proposal of the Puerto Rico Telephone Company (“PRT”), set out in its ex parte letter of October 11, 2011 reporting on its meeting with Commissioner Copps’ staff regarding reform of the Universal Service Fund (“USF”).¹ Specifically, we support PRT’s recommendation regarding the Connect America Fund that:

“... any interim or future cost model distribute to areas in Puerto Rico that currently lack access to broadband [receive] no less federal universal service support than the island of Puerto Rico received from the high cost mechanism in 2010. This interim requirement should remain in effect until broadband deployment and subscribership measures in Puerto Rico resemble national measures. This approach is in the public interest, consistent with the plain terms of Section 254(b) of the Communications Act, and appropriate to ensure

¹ See Ex Parte Letter to Secretary Marlene H. Dortch from Thomas J. Navin, Counsel, Puerto Rico Telephone Company, Federal-State Joint Board on Universal Service, CC Docket No. 96-45 et al. (filed Oct. 12, 2011).

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that Puerto Rico receives the transformational benefits engendered by ubiquitous broadband deployment.”²

We agree with PRT that the Commission should make available sufficient high-cost fund resources to support deployment in insular areas such as Puerto Rico where broadband service is extremely limited, to comport with requirements of the Act and ensure that the citizens of Puerto Rico have an opportunity to attain first class digital citizenship.³

Respectfully submitted,

David Honig

David Honig
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² Id.

³ Ex Parte Letter to Chairman Genachowski and Commissioners from David Honig, President, MMTTC, Federal-State Joint Board on Universal Service, CC Docket No. 96-45 et al. (filed Oct. 14, 2011).