



July 24, 2012

VIA ELECTRONIC SUBMISSION

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

Re: *Connect America Fund*, WC Docket No. 10-90
High-Cost Universal Service Support, WC Docket No. 05-337

Dear Ms. Dortch:

The Virgin Islands Telephone Corp. d/b/a Innovative Telephone (“VITELCO”) respectfully submits this letter in response to the Wireline Competition Bureau’s April 25, 2012 Public Notice.¹

VITELCO is committed to deploying broadband in the United States Virgin Islands (“USVI”) and believes that the incremental support the Commission has made available under the Connect America Fund Phase I (“CAF Phase I”) would assist in that effort. However, VITELCO is unable at present to provide the requisite certifications necessary to take advantage of these funds.

Specifically, a carrier accepting incremental support under CAF Phase I must certify that deployment funded through such support “will occur in areas shown as unserved by any other carrier on the National Broadband Map, and that, to the best of the carrier’s knowledge, the locations to be served are, in fact, unserved.”² According to the National Broadband Map, fixed broadband service is ubiquitously available in the USVI. Unfortunately, based on VITELCO’s experience, the National Broadband Map overstates the availability of fixed broadband, and areas that the map reflects as served are in fact unserved.

VITELCO is the only wireline broadband provider in the USVI. While several providers offer fixed wireless broadband, the service is not available throughout the USVI as a practical matter because of the unique typography of the territory and technical issues associated with fixed wireless service. Indeed, according to the Commission’s most recent data, the percentage of

¹ Public Notice, *Wireline Competition Bureau Announces Support Amounts for Connect America Fund Phase I Incremental Support*, WC Docket Nos. 10-90, 05-337, DA 12-639 (rel. April 25, 2012).

² Public Notice ¶ 11.

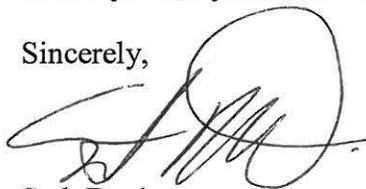
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connections in the USVI with a downstream speed of at least 768 Kbps as of June 30, 2011 was less than 75 percent.³ Based on the Commission's data, which is consistent with VITELCO's experience, there are considerably more unserved locations in the USVI as compared to what is reflected on the National Broadband Map.

Regardless of the reasons for this apparent discrepancy, residents of the USVI stand to lose if CAF Phase I support is not made available to VITELCO – a result that would be particularly regrettable given that the USVI lags in broadband availability as compared to the mainland. Given its commitment to supporting broadband deployment, the Commission should make every effort to allow CAF Phase I support to be put to use in the USVI, notwithstanding the availability of fixed broadband as reflected on the National Broadband Map. VITELCO is prepared to work with the Commission in this regard so that residents of the USVI benefit from CAF Phase I support.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Seth Davis', with a large, stylized flourish above the name.

Seth Davis

³ *Internet Access Services: Status as of June 30, 2011*, Industry Analysis and Technology Division, Wireline Competition Bureau, Federal Communications Commission, Table 20 (June 20, 2012).