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September 7, 2012

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**VIA ELECTRONIC SUBMISSION**

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

Re: *Connect America Fund; Universal Service High-Cost Filing Deadlines; Petition of Virgin Islands Telephone Corp. d/b/a Innovative Telephone for Waiver of Section 54.904(d) of the Commission's Rules, WC Docket No. 10-90, WC Docket 08-71*

Dear Ms. Dortch:

On September 5, 2012, Seth Davis, President and Chief Executive Officer of the Virgin Islands Telephone Corp. d/b/a Innovative Telephone ("Innovative"), and the undersigned with Wiley Rein LLP, counsel for Innovative, met with Trent Harkrader and Heidi Lankau with the Wireline Competition Bureau. Amy Bender of the Wireline Competition Bureau participated by telephone.

During this meeting, Innovative requested that the Commission promptly grant the company's petition seeking a waiver of section 54.904(d) of the Commission's rules. As explained in its petition and as discussed during the meeting, Innovative failed to file the requisite certification regarding its use of Interstate Common Line Support ("ICLS") by the July 2, 2012 deadline because of a misunderstanding regarding the interplay between section 54.904(d) and new section 54.313 of the Commission's rules. However, Innovative promptly filed the certification within eight business days after the deadline when it discovered that the certification was still required and has taken corrective measures to ensure compliance with the Commission's rules and future universal service filing requirements going forward. Thus, as Innovative noted in the meeting, the granting of the requested waiver would be consistent with Commission precedent.

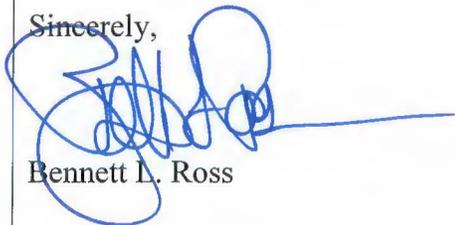
During the meeting, Innovative also discussed the significant harms to the company and residents of the United States Virgin Islands if a waiver is not granted. Specifically, Innovative stands to lose more than \$6.4 million in ICLS, which would disproportionately penalize Innovative and create a substantial hardship on its customers, many of whom already are struggling under difficult economic circumstances. In addition, Innovative noted that it is in the midst of significant

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upgrades to its network facilities, and universal service support is a critical source of funding, without which Innovative would be unable to complete its network modernization program – a result that would be inconsistent with the Commission's goals in reforming the high-cost universal service fund.

Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced dockets.

Sincerely,



Bennett L. Ross

cc: Trent Harkrader  
Amy Bender  
Heidi Lankau