

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Request for Review by Cordova Wireless Communications, LLC of A Decision of Universal Service Administrator	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337

**REPLY COMMENTS OF CORDOVA WIRELESS COMMUNICATIONS, LLC**

Cordova Wireless Communications, LLC (“Cordova”), by its attorneys, hereby replies to the comments filed in response to Cordova’s Request for Review in the above-referenced proceeding. Only two parties filing comments in this proceeding addressed Cordova’s Request for Review.<sup>1</sup> Both Copper Valley Wireless, LLC (“CVW”) and General Communication Inc. (“GCI”) filed comments in support of Cordova, and no party opposed any asserted basis for relief presented in the Request for Review. Accordingly, based on the arguments and evidence set forth by Cordova in its Request for Review and in its two *ex parte* submissions<sup>2</sup>, the Federal Communications Commission (“FCC” or “Commission”) should grant the relief requested in the Request for Review.

Going forward, Cordova supports GCI’s recommendation that, in the absence of any evidence that a service provider has been “gaming” locations, “the Commission should instruct USAC to permit the use of any reasonable and consistently-applied methodologies that

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<sup>1</sup> Three parties filed Comments – Copper Valley Wireless, LLC, General Communication Inc., and Verizon and Verizon Wireless. The Comments of Verizon and Verizon Wireless did not specifically address Cordova’s Request for Review.

<sup>2</sup> Letter from Michael R. Bennet to Marlene H. Dortch, July 18, 2013; Letter from Michael R. Bennet to Marlene H. Dortch, August 13, 2013.

approximate correlating the support to the location of service.”<sup>3</sup> Cordova notes that the record in this proceeding contains no allegations or evidence that Cordova has been “gaming” locations, and Cordova has provided extensive evidence to the contrary.

Respectfully submitted,

**Cordova Wireless Communications, LLC**

By: */s/ Michael R. Bennet*

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Dated: August 14, 2013

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<sup>3</sup> GCI Comments at p. 1.