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October 18, 2013

**Via ECFS**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

**Re: WC Docket No. 10-90**

Dear Ms. Dortch:

Virgin Islands Telephone Corporation (“Vitelco”) d/b/a Innovative Telephone submits this letter to supplement the record concerning Vitelco’s estimate of plant mix percentages for the U.S. Virgin Islands for use in the Connect America Cost Model.

Solely for purposes of comparison, Vitelco is submitting the attached table that reflects the current plant mix in use in the U.S. Virgin Islands. Because this table reflects Vitelco’s historical investment decisions, rather than the design of a forward-looking network, Vitelco does not believe it is appropriate to use these values in developing the CACM.

Vitelco notes that its plant mix values for Rural, Suburban, and Urban density zones are identical because the company does not maintain its outside plant records in a format that enables it to compute separate values for such zones. The USVI islands are relatively small areas over which the population density is largely homogeneous and, while there are some concentrations of businesses, the related geographical areas are extremely small. Under these conditions, the plant mix percentages are unlikely to vary significantly from one density category to the next, so it makes little sense to go to the expense of maintaining records by density categories.

Please do not hesitate to contact the undersigned with any questions.

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Respectfully submitted,

*/electronically signed/*

Russell M. Blau  
Counsel for Virgin Islands Telephone Corporation

cc: Carol Matthey  
Amy Bender  
Katie King

Attachment

**Table 1**

State	Density	Dist			FDR			IOF		
		Aerial	Buried	Underground	Aerial	Buried	Underground	Aerial	Buried	Underground
VI	Rural	93.7%	0.0%	6.3%	15.7%	50.8%	33.5%	31.3%	20.6%	48.1%
VI	Suburban	93.7%	0.0%	6.3%	15.7%	50.8%	33.5%	31.3%	20.6%	48.1%
VI	Urban	93.7%	0.0%	6.3%	15.7%	50.8%	33.5%	31.3%	20.6%	48.1%