

Strategies Law Group, PLLC

May 12, 2015

VIA EFCS

Ms. Marlene J. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Communication- *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Connect America Fund*, WC Docket No. 10-90; *Rural Broadband Experiments*, WC Docket No. 14-259

Dear Ms. Dortch:

On Monday, May 11, 2015, Robert Nichols, Chief Executive Officer of Declaration Networks Group, Inc. (“Declaration”) and Brian McDermott of Strategies Law Group, PLLC, outside counsel for Declaration, participated in a meeting at the Federal Communication Commission with Alexander Minard, Heidi Lankau and Katie King of the Federal Communication Commission’s Wireline Competition Bureau to discuss the next phase of the Connect America Fund (“CAF”) grants and what qualifications will be needed for participants in that phase.

Declaration was granted a provisional grant of funding in the Rural Broadband Experiments but that grant was subsequently eliminated solely because Declaration had not been in existence for three (3) years and, as a result, it could not fulfil the requirement to provide the Commission with three (3) years of audited financial statements. During the discussion, Declaration advocated maintaining the technical, economic and engineering qualification requirements for future phases of rural broadband grants but advocated that the Commission make changes to the requirement that winning bidders maintain a letter of credit for one hundred percent (100%) of the funding over the course of the 10-year funding period. Specifically, Declaration advocated that funding recipients should be released from its Letter of Credit obligations upon certification by the recipient that it has satisfied its deployment obligations.

The discussion also centered on Declaration’s pending request for ETC designation in certain areas of Virginia and what options Declaration will have to amend its ETC designation request to other/additional areas if Declaration is successful in being granted CAF funding in the future. Staff indicated the having an ETC designation will likely be a requirement in future phases of CAF funding and that grantees should be given sufficient time to secure such designation following future grants.

Additionally, there was some conversation about what census tracts were eligible for price cap carriers to seek Phase I incremental support and whether there is an inconsistency in including census tracts covered by bidders who were awarded initial provisional grants and then subsequently were eliminated from the process while census tracts of current “next in line” bidders that are currently in the review process were not included in the price cap offerings even though some of those bidders will be eliminated in the future for failure to meet the requirements.

Pursuant to Section 1.1206 of the Commission’s rules, this letter is being electronically filed via ECFS with your office, and a copy of this submission is being provided to the meetings attendees.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brian McDermott", with a stylized flourish at the end.

Brian McDermott

Counsel for Declaration Networks Group, Inc.