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June 3, 2019

Serial: 436

Ryan Palmer
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Via ECFS

Re: *American Samoa Telecommunications Authority, Petition for Reconsideration, CC Docket 02-6*

Dear Mr. Palmer:

I am writing this letter in support of the American Samoa Telecommunications Authority's (ASTCA's) Petition for Reconsideration. ASTCA asks that the Wireline Competition Bureau reconsider its denial of a request for a waiver of an E-rate program-related filing deadline. Without a favorable ruling, ASTCA risks losing out on badly-needed revenues that it earned by meeting its service obligations. This means that American Samoa's residents risk losing out on better, and more affordable communications services in our schools, libraries, community college and hospital.

As the Lieutenant Governor and the Acting Governor for American Samoa, as well as the Federal Emergency Management Agency (FEMA)-recognized Governor's Appointed Representative (GAR), I am responsible for working with FEMA to secure disaster relief for American Samoa. Because of my experience in these roles, I am keenly aware of the challenges faced by American Samoa entities following Tropical Storm Gita in February last year. American Samoa's infrastructure was devastated. Entities like the Department of Education (DOE) and ASTCA faced an uphill battle as they worked to repair their facilities and restore services after the storm.

ASTCA, the largest and only government-owned provider of communications services in American Samoa, has long delivered an important service to our population. Because the DOE and its E-rate program are part of our territory-wide government and thus under the purview of the Governor's Office, I know that E-rate support has made a significant difference in the quality and range of services that ASTCA has been able to provide. After Gita, these services—which ASTCA provides not just to DOE schools, but also to our community college and our hospital—are even more essential. Our DOE Director has stated that ASTCA is and, has always been, an excellent service provider and partner to our E-rate program.

As a government official, I understand the importance of requiring strict adherence to program rules to ensure adequate administration of public funds. But as Acting Governor and GAR, I also understand that situations outside an agency's control can derail the best of plans. Given the circumstances leading to ASTCA's late submission, I ask that you make an exception to your rules and accept and pay ASTCA's late-filed invoices this one time. I have met with ASTCA and DOE representatives to ensure that this situation does not happen again.

On behalf of the American Samoa government, we respectfully request that you consider what is at stake for our people and give ASTCA the chance to receive payment on its invoices. The people of American Samoa have already suffered tremendous devastation at the hands of Gita; please do not make the damage even worse by preventing ASTCA from being paid for the services it rendered to our 17,000 school children.

Please feel free to contact me with any questions.

Respectfully,

A handwritten signature in black ink, appearing to read 'Lemanuel S. Mauoa', is written over a circular stamp or seal.

Lemanuel S. Mauoa
Acting Governor
Governor's Authorized Representative