



July 15, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

**Re: Notice of *Ex Parte* in WC Docket No. 02-6; WC Docket No. 13-184; RM-11841;
WC Docket No. 17-310; WT Docket 18-120**

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, I hereby provide notice of an oral *ex parte* conversation on Friday, July 12, 2019 between the undersigned and Randy Clarke in Commissioner Starks' office concerning the Texas Carriers Petition to undermine competition for E-rate services, the EBS rulemaking decision and the Rural Health care proceeding.

Regarding the Texas Carriers petition to undermine competition, I noted that the Texas carriers did indeed have the opportunity to participate in the E-rate bidding process, despite their claims to the contrary. I also pointed out that their proposed reforms to the E-rate competitive bidding process would result in higher costs for schools and libraries and a higher amount of E-rate funding for services that could be inferior to those being provided by the winning bidder in the competitive bidding process.

Regarding EBS, I expressed our deep disappointment in the decision to eliminate the preference for educational institutions and to auction the licenses for EBS "white spaces" channels, and I expressed strong support for Commissioner Starks' statement at the FCC meeting two days earlier.

Regarding the new proposed Order regarding the Rural Health care proceeding, I said that the SHLB Coalition was still examining the draft and that we had some potential concerns about the complexity of how to determine the urban and rural rates. While we appreciate the effort to bring some of the E-rate rules over to the RHC program, we continue to see a value in allowing providers to submit a single application for both E-rate and RHC funding.

Sincerely,

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