
Alaska Telephone Association

Dave Goggins
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Christine O'Connor
Executive Director

October 3, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

RE: Ex parte filing in WC Docket Nos. 16-271, 10-90 and 11-42

Dear Ms. Dortch:

On September 29th the undersigned met separately with Jay Schwarz, Wireline Advisor to Chairman Pai, Amy Bender, Legal Advisor to Commissioner O'Rielly, and Travis Litman, Legal Advisor to Commissioner Rosenworcel, and jointly with Jesse Jachman, Ying Ke, Jonathan Lechter, Alec MacDonell, and Alexander Minard in the Wireline Competition Bureau and Matt Warner, Matthew Collins, Peter Trachtenberg, Garnet Hanly, and Nese Guendelsberger in the Wireless Telecommunications Bureau to discuss reporting requirements related to the Alaska Plan, projects underway by companies participating in the Plan, and minimum standards for Lifeline service in remote Alaska.

The Alaska Plan Order requires companies participating in the Alaska Plan to provide maps of fiber and microwave middle mile facilities existing today and deployed during the term of the Plan.¹ The instructions for reporting these middle mile facilities were provided in a Public Notice released September 8, 2017. However, the instructions, as released, require extensive reporting or last mile facilities and will be extremely time-consuming and expensive to implement. Ms. O'Connor expressed concern that without modification, the additional reporting beyond middle mile facilities will divert significant resources from broadband service and deployment and is beyond the scope of the Alaska Plan Order.

Ms. O'Connor provided a list of some of the projects underway by companies participating in the Alaska Plan (attached). She requested that companies participating in the Alaska Plan be granted access to the High Cost Universal Broadband (HUBB) portal as quickly as possible so they can upload geocoded locations of broadband service where it has already been provided under the Alaska Plan.

Ms. O'Connor also discussed the need for Lifeline service in Alaska's most remote areas and the barriers created by the minimum standards of the program. She suggested that clarification and waiver of certain standards in limited areas will be necessary to allow qualifying subscribers in remote Alaska to participate in Lifeline.

Respectfully submitted,

¹ See Alaska Plan Order, released August 31, 2016 at paragraph 102.

Via ECFS 10/3/2017

Christine O'Connor
Executive Director

cc: Jay Schwarz
Amy Bender
Claude Aiken
Travis Litman
Alexander Minard
Jesse Jachman
Ying Ke
Jonathan Lechter
Alec MacDonell
Matt Warner
Matthew Collins
Peter Trachtenberg
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Alaska Plan Update – Sample projects underway in 2017

- Copper Valley Telephone Cooperative is deploying fiber optic cable to increase the reliability and capacity of their service.
- In anticipation of being able to have fiber-optic connectivity for the first time ever, OTZ has built out a fiber ring around Kotzebue, and is in the process of upgrading and providing 4G LTE service to the eleven communities in its service area.
- TelAlaska extended fiber optic capability from Moose Pass to Seward.
- ASTAC has installed fiber optic drops to 100% of the homes and businesses in Point Hope, Wainwright, and Nuiqsut and has recently upgraded wireless service to 4G in Deadhorse/Prudhoe Bay and all 8 North Slope villages.
- KPU in Ketchikan offers world-class broadband and television services over an all-IP, fiber to the home network – and recently completed construction of an Alaska to Canada digital Microwave network.
- In the Matanuska-Susitna Valley, MTA has deployed 98 miles of fiber optic cable in the past year and offers gigabyte service in many areas. Over 4,500 homes and businesses have direct access to fiber connections, i.e. fiber to the home or business.
- By the end of 2017, GCI's TERRA project, a \$300 million broadband network, will provide high-speed internet access to 45,000 people in 84 western Alaska communities. This summer, because of TERRA network upgrades, GCI increased monthly data while lowering costs for plans in rural hub communities.

September 29, 2017