
Alaska Telecom Association

Dave Goggins
President

201 E. 56th Avenue, Suite 114
Anchorage, AK 99518
(907) 563-4000
www.alaskatel.org

Christine O'Connor
Executive Director

Via ECFS and Hand Delivery

February 8, 2019

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

RE: Ex parte filing in WC Docket No. 16-271

Dear Ms. Dortch:

The Alaska Telecom Association (“ATA”) writes on behalf of its members that are participating in the Alaska Plan as mobile carriers—Arctic Slope Telephone Association Cooperative, Bristol Bay Cellular, Copper Valley Wireless, Cordova Wireless, GCI Communication Corp. (“GCI”), OTZ Wireless, TelAlaska Cellular, and Windy City Cellular (collectively the “Mobile Participants”). At the request of staff of the Wireless Telecommunications Bureau, the Mobile Participants have reviewed the population distribution model submitted to the Commission in November 2016 to assess whether the model reasonably establishes approximate locations of the population within each Participant’s Alaska Plan-eligible service areas. ATA agrees that for most areas of remote Alaska, the November 2016 model reasonably approximates the location of populated areas. In a few areas, ATA has used other local data sources to override the populated areas identified by the original model to better reflect the location of population. The revised population distribution polygons are provided on a DVD with this letter. Census blocks with manually modified population polygons are listed in the spreadsheet attached to this letter.

The model and resulting polygons are the same as what GCI filed in November 2016 except as follows:

1. The new polygons reflect manual updates in and around Unalaska in 31 census blocks. Specifically, we obtained address and location information from the local government and created polygons around addresses (with a 50 meter buffer) in residential areas to represent the location of population.
2. Near Nome and Unalakleet, we used aerial imagery obtained data from Google Earth¹ to identify building structures, then manually drew polygons around them as a proxy for the location of population in 187 census blocks.
3. In the Prudhoe Bay area, where we believe the 2010 census reflects primarily oil field workers rather than year-round population, we used Google Earth² and internal ASTAC

¹ Google (c) Alaska imagery.

² Google (c) Alaska imagery.

location data to identify populated areas (primarily developed worksites, mobile camps, and staging areas) in 16 census blocks.

4. In the Copper Valley area we've used Google Earth³ and internal Copper Valley Telephone Company structural location data in 61 census blocks.

In all cases (both original model polygons and modified polygons) the model distributes the population of each census block evenly within the census block's polygons.

Alaska is a vast state with some populated census blocks as large as New Jersey. The Mobile Participants believe that the model as modified here is a reasonable approximation of the location of population in eligible census blocks but may discover during actual on-the-ground deployment and upgrade activities that the model does not accurately reflect precise locations. Rather than build out to or upgrade unpopulated locations simply to match the model, ATA will inform the Bureau of the discrepancy and provide updated information. In this way, the Mobile Participants will honor the purpose of the Alaska Plan and their own commitments to improve service to specific numbers of population while ensuring accountability and transparency.

Respectfully submitted,

Christine O'Connor
Executive Director

Attachment (list of relevant census blocks)

cc: Matt Warner (shapefiles via DVD-R)
Matthew Collins (shapefiles via DVD-R)

³ Google (c) Alaska imagery.