
Alaska Telecom Association

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Christine O'Connor
Executive Director

February 14, 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:

On February 12 and 13, 2019, the Alaska Telecom Association ("ATA") participated in several ex parte meetings regarding the Alaska Plan network mapping requirements:

- On February 13, 2019, Christine O'Connor of ATA met with Preston Wise, Acting Special Counsel to Chairman Pai.
- On February 12, 2019, Ms. O'Connor, Julie Veach of Harris, Wiltshire & Grannis LLP, and Tim Stelzig of GCI (by telephone) met with Arielle Roth, Wireline Legal Advisor to Commissioner O'Rielly.
- On February 12, 2019, Ms. O'Connor, Ms. Veach, and Mr. Stelzig (by telephone) met with Jamie Susskind, Chief of Staff to Commissioner Carr.
- On February 12, 2019, Ms. O'Connor, Ms. Veach, and Chris Nierman of GCI met with Randy Clarke, Acting Legal Advisor for Wireline and Public Safety to Commissioner Starks.
- On February 12, 2019, Ms. O'Connor, Ms. Veach, and Mr. Nierman met with Alex Minard and Jesse Jachman of the Wireline Competition Bureau; and Jonathan Lechter, Garnet Hanly, Matt Warner, and Ben Freeman of the Wireless Telecommunications Bureau. Additional attendees participated by telephone: Eric Anderson of Matanuska Telephone Association, Mark Ayers and Mr. Stelzig of GCI, Jason Louvier and Bob Dunn of TelAlaska, Doug DeVore of Bush-tell, and Thomas Warren of Mid-State Consultants.

In the meetings, we discussed ATA's Petition for Limited Waiver,¹ which seeks flexibility in one of the requirements that applies to the network maps that Alaska Plan participants must file on March 1.² Specifically, the waiver seeks flexibility in the spatial accuracy requirement for buried fiber and aerial fiber links. The participants explained that, while the *Middle Mile Mapping Order* requires providers to certify that all data in the map are accurate to within 7.6 meters of accuracy, the providers do not have records that they can certify meet that standard for all buried and aerial fiber.

We discussed the challenges of certifying to strict levels of spatial accuracy in Alaska. First, the providers have no business reason to maintain buried and aerial fiber records to that level of

¹ See Petition for Limited Waiver of Alaska Telecom Association to Permit Commonly Accepted Industry levels of Spatial Accuracy for Middle Mile Fiber Route Mapping, WC Docket No. 16-271 (filed Feb. 6, 2019).

² See *Connect America Fund – Alaska Plan*, Order on Reconsideration, 33 FCC Rcd. 2068 (Wireline Comp. and Wireless Telecomm'n's Burs. 2018) ("Middle Mile Mapping Order").

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spatial accuracy. Second, in many cases providers' records offer relative—not absolute—positions. They may reflect, for example, that fiber is buried along a particular street or road, rather than identifying the latitude and longitude of its position. Efforts to align providers' own relative records with other existing datasets—such as borough maps—likewise have not yielded data to within 7.6 meters of accuracy because the other maps are not certifiable to that level of accuracy.

We also discussed possible solutions. For example, we discussed whether providers might be able to certify that their data are accurate to a standard other than 7.6 meters.

Respectfully submitted,

Via ECFS 2/14/2019

Christine O'Connor
Executive Director

cc: Preston Wise
Arielle Roth
Jamie Susskind
Randy Clarke
Ben Freeman
Garnet Hanly
Jesse Jachman
Jonathan Lechter
Alex Minard
Matt Warner