
Alaska Telecom Association

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Christine O'Connor
Executive Director

February 19, 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 19, 2019, Christine O'Connor of the Alaska Telecom Association ("ATA"); Luke Middle of Arctic Slope Telephone Association Cooperative; Eric Anderson of Matanuska Telephone Association; Rick Hitz, Phil Treuer, and Tim Stelzig of GCI Communication Corp.; and Julie Veach of Harris, Wiltshire & Grannis LLP spoke by telephone with Jonathan Lechter, Matt Warner, and Ying Ke of the Wireless Telecommunications Bureau. We discussed the proposal below for the upcoming March 1 deadline for Alaska Plan participants to file and certify their network maps.

As ATA members discussed with staff last week, the Alaska Plan participants face a variety of obstacles to reporting the locations of their buried and aerial fiber links to within 7.6 meters and certifying that the information is accurate to a 95% confidence level.¹ The affected ATA members have reviewed their available data and are in a position to report the locations of their buried and aerial fiber links to within 50 meters and certify that the information is accurate to an 80% confidence level.

ATA thanks the Bureaus for considering this alternative proposal and will expeditiously respond to any follow-up questions they may have.

Respectfully submitted,

Via ECFS 2/19/2019

Christine O'Connor
Executive Director

cc: Ben Freeman
Garnet Hanly
Jesse Jachman
Ying Ke
Jonathan Lechter
Alex Minard
Matt Warner

¹ See Letter from Christine O'Connor, Alaska Telecom Ass'n, to Marlene H. Dortch, FCC, WC Docket No. 16-271 (filed Feb. 14, 2019). The mapping instructions require that all links and nodes be spatially accurate to within 7.6 meters and require filers to certify that accuracy to a 95% confidence level. See *Connect America Fund – Alaska Plan*, Order on Reconsideration, 33 FCC Rcd. 2068, 2081, 2083 (Wireline Comp. and Wireless Telecomm'ns Burs. 2018).