

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

<i>In the Matter of</i>)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
Connect America Fund)	WC Docket No. 10-90

**REPLY COMMENTS OF ALASKA TELEPHONE ASSOCIATION REGARDING ITS
PETITION FOR CLARIFICATION AND WAIVER OF LIFELINE MINIMUM
SERVICE STANDARDS**

On December 4, 2017, Alaska Telephone Association (“ATA”) filed its Petition for Clarification and Waiver of Lifeline Minimum Service Standards, seeking reasonable and clear interpretations of the Commission’s Lifeline rules and waivers, where appropriate, to ensure that the Commission’s Lifeline program does not leave Alaska’s remote population behind.¹ The record reflects support for the Petition to enable “thousands of low-income consumers living in remote Alaska the opportunity to obtain an Internet connection that may otherwise be beyond their reach,”² and to “ensure that all Alaskan Lifeline customers are able to connect to the

¹ Alaska Telephone Association Petition for Clarification and Waiver of Lifeline Minimum Service Standards, WC Docket Nos. 11-42, 09-197, & 10-90 (filed Dec. 4, 2017) (“Petition”). The Wireline Competition Bureau released a Public Notice seeking comment on the Petition. *Wireline Competition Bureau Seeks Comment on Alaska Telephone association Petition for Clarification and Waiver of Lifeline Minimum Service Standards*, Public Notice, DA 18-34 (Wireline Comp. Bur. Jan. 11, 2018).

² Comments of NTCA-The Rural Broadband Association, WC Docket Nos. 11-42, 09-197, & 10-90, at 3 (filed Feb. 12, 2018).

network.”³ There is no opposition to the Petition. The Commission should grant it expeditiously.

ATA’s requests are modest but critical to Alaskan consumers:

- Clarify that an ETC “provides” 3G service consistent with the Commission’s minimum standards for mobile wireless Lifeline if the ETC makes 3G service on its own network available to the consumer, even if the consumer’s residential address or other specific locations are not yet served with 3G.
- Waive the 3G minimum standard for ETCs that do not yet offer 3G service to allow them to provide a 2G Lifeline broadband service where it is already available. ATA requests this waiver for all remote Alaska ETCs—even those that have already deployed 3G or LTE—to the extent that the Commission does not grant the clarification described above.
- Waive the 4/1 Mbps minimum speed standard for fixed broadband service where ETCs do not yet offer that speed to allow them to offer Lifeline Internet access service at lower speeds.
- Waive the “highest performing service” requirement, which limits Lifeline support for service at speeds less than 15/2 Mbps (or the current minimum), to the ETC’s highest performing service. ETC’s highest performing services can cost hundreds of dollars, putting them beyond the reach of low-income consumers.

This relief would bring substantial benefits by ensuring that eligible remote Alaskans have options for Lifeline service similar to those available to consumers in the Lower 48—a choice between mobile wireless or fixed service at affordable rates. In many areas, this relief is only temporary. As Alaska Plan participants fulfill their commitments to bring 3G and LTE wireless service and fixed service of 25/3 Mbps or better, the relief will become obsolete in upgraded areas. Over 60 percent of remote Alaskans are expected to have 25/3 Mbps service by the end of the Alaska Plan term, and participants have committed to provide LTE service to over 120,000 remote Alaskans.⁴ Even more consumers will see improvements as a result of the

³ Comments of WTA-Advocates for Rural Broadband, WC Docket Nos. 11-42, 09-197, & 10-90, at 6 (filed Feb. 12, 2018).

⁴ See Petition at 4.

reverse auction to bring mobile wireless service to unserved areas. In the meantime, and for the benefit of eligible consumers in areas that are not being upgraded, a clarification and waivers from the Commission will ensure that consumers continue to have appropriate access to Lifeline services.

Respectfully submitted,

/s/

Christine O'Connor
Executive Director
ALASKA TELEPHONE ASSOCIATION
201 E. 56th Avenue, Suite 114
Anchorage, Alaska 99518
(907) 563-4000

February 26, 2018