

Reference: Matanuska Telephone Association, WC Docket No. 17-363, Comp. Pol. File No. 1422

We are filing this comment in **opposition** to the termination of the Basic Exchange Telecommunication Radio Service (BETRS) by Matanuska Telephone Association (MTA).

This BETRS service area covers over 2000 sq. miles in one of the most remote locations in the United States. Over 95% of the area is not road accessible and is accessed only by boat, small plane or overland in the winter months (track equipped vehicles, dog team, ski, foot, etc). There are a handful of communities in the region with only a few dozen residents. Most residents live outside these communities and are separated by miles of wilderness.

MTA made no prior attempt to inform or seek input from the customers this closure will affect by the filing for discontinuance to the Federal Communication Commission (FCC). It is an arbitrary decision made by MTA with total disregard to the welfare of its owner/customers (MTA is a customer/owner association), public safety or community welfare.

MTA states in its application to the FCC:

Mobile service has vastly improved in quality and availability making the BETRS service unnecessary and substandard. MTA recently exited the wireless market and sold the towers holding the BETRS equipment and its CDMA spectrum to another wireless carrier. MTA believes that wireless service is more reliable and a better choice for customers than the now obsolete BETRS service.

This statement is basis for the request to discontinue service and is absolutely false! If the FCC investigates this statement it will find that the towers supporting

BETRS are still owned by MTA. Each of the options identified by MTA are either inferior or non-existent in the coverage area.

- AT&T has no coverage for the affected area
- GCI has no coverage for the area and contrary to MTA's assertion is not planning to install any equipment that would provide coverage.
- Verizon did provide some coverage to the region, but due to actions by MTA in October, 2017 that coverage has been reduced by 75 percent.
- HughesNet satellite internet (VOIP) provides coverage to only approximately 20% of Alaska. It sets only 9 degrees above the horizon and is highly affected by terrain and weather. The cost of installation alone is well over \$1000 with high monthly fees.
- Exede (ViaSat) satellite internet while having a better coverage area does not authorize (VOIP) over its network covering Alaska. It does not provide the bandwidth for reliable VOIP service and is significantly impacted by weather causing outages that can often last over 24 hours at a time. Like HughesNet it has an installation cost of well over \$1000 and high monthly fees.
- Iridium and Global Star are satellite telephone services that have been rejected by customers of the region for years. Satellite telephones are expensive, latency is a serious problem, often don't work inside of building and are expensive to use.

MTA states BETRS currently has 215 customers. These numbers are misleading for a couple of reasons. In 2017 when MTA sold its cell service to Verizon, MTA cell customers lost their cell service and were forced to sign up with Verizon to continue to receive cell service. A number of these customers found their new Verizon supported cell phones had better coverage/signal and opted to discontinue their BETRS telephones. Without notice MTA in October 2017 reduced the Verizon coverage area by 75% (as stated above) and many of those customers found their cell phones no longer worked. Yet, they have not been allowed to re-establish their BETRS telephones leaving them with no telephone service at all. Second, based on MTA's encouragement to engage in one of the

other “better services” listed above residents have found them to be quite inferior to the BETRS systems, but again cannot re-establish their old service. The customer base is far larger than the 215 subscribers MTA would lead you to believe are affected.

Approval of MTA’s request will have devastating impact on the region’s economy and more important it will catastrophically impact public safety for its residents and the thousands of recreational users of this popular recreational destination.

Most of the affected region has no fire, police, electric, sewer or water to bolster our businesses. All we have for infrastructure is telephone and this action will terminate that basic service for most businesses in the region. How do we survive?

For these reasons the FCC should disapprove this request. At a minimum MTA’s request should be returned with instructions to work with its customers, local community and government to come up with legitimate alternative services that meet customer needs, do not compromise public safety and do not have negative economic impact on the region.