



## MATANUSKA-SUSITNA BOROUGH

### Office of the Borough Manager

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February 27, 2018

Attn: Ms. Kimberly Jackson  
Ms. Carmell Weathers

Federal Communications Commission  
Wireline Competition Bureau  
Competition Policy Division  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Section 63.71 Application of Matanuska Telephone Association, Inc. Authority to  
Discontinue Certain Services

Subject: Objection to Matanuska Telephone Association, Inc. (MTA) Application to  
Discontinue the Provision of retail Basic Exchange Telecommunications Radio  
Service (BETRS) in its territory in the State of Alaska, WC Docket No. 17-363,  
Comp. Pol. File No. 1422.

Dear Ms. Jackson and Ms. Weathers,

We very strongly object to discontinuance of BETRS service at this time. The BETRS system is a subset of the Rural Radiotelephone Service. It is a vintage fixed wireless technology that provides basic telephone service in locations deemed so remote that traditional wireline series or service by other means is not feasible. This is not just a nice-to-have service, it is the only critical 911- lifesaving service available in remote areas where many of our citizens live. MTA asserts that they are not the dominate provider, but in the majority of these remote areas MTA has been the only provider for decades and we cannot show at this time that this status has changed in several critical areas.

The Matanuska-Susitna Borough represents over 103,000 people in a land mass which covers over 25,000 square miles, most of which has no road infrastructure. Travel to and from hundreds of homes is only by air, boat or all-terrain vehicles. As our Borough is the “county-level” government representing these citizens, we file this formal objection to MTA’s discontinuance of this vital life-saving BETRS service to our citizens.

*Providing Outstanding Borough Services to the Matanuska-Susitna Community.*

We present the following information and rationale for your consideration.

- First-hand accounts from people using this critical service
- MTA's lack of a specific list of hundreds of BETRS customers affected
- MTA's lack of critical specificity regarding what replacement services are available to replace each customer's BETRS wireless service

At a minimum, before we would agree with discontinuance of this BETRS service, we request to know how these remote customers can be served by other providers individually and specifically. What MTA sent customers is a page showing "potential alternative solutions," and a statement that *"Three wireless carriers and satellite providers currently provide service in the MTA territory providing competitive choices for customers transitioning their service from the MTA network."* However, our preliminary information reveals that in many cases none of these referenced providers may be able to give the essential wireless service needed by our citizens. Here is an example of some of the information we have received from citizens and providers at this time:

- Regarding MTA reference of Satellite phone service: basic satellite service is not possible in many of our remote areas where our citizens live. This is because the orbits for these satellites, this far north, requires an approximate 9 degree look angle, which fundamentally will not work in mountainous areas—i.e. most of our Borough's 25,000 square miles is mountainous. Additionally, our information source advised us that VIASAT does not offer telephone or Voice over Internet Provider (VOIP) service in Alaska at all. The satellite service is so poor in this part of the far north that our Borough Emergency Services is in the process of dropping our satellite phone service contract because they do not provide reliable service for our rescue crews.
- Regarding the MTA reference about the General Communications Inc. (GCI) plans to place equipment at Shell and Bald Mountains. Our sources called GCI to ask about this information and were advised that GCI has no plans they know of and certainly not for the next two years. For reference, these two mountains are in areas where numerous BETRS customers live year around.
- Regarding the MTA reference to AT&T Service: our sources advise that AT&T has nothing west of the Susitna River, which is that area where Shell Mountain is located and where numerous BETRS customers reside.
- Regarding the Verizon alternative mentioned by MTA: We do acknowledge that some of the BETRS customers have cancelled their BETRS service, when MTA sold their regular wireless system (not BETRS) to Verizon, in October of 2017, because they could get the Verizon service. One source estimated that at that time there were over 400 BETRS customers. However, since that sale in October, we have also received complaints that Verizon has cut back on their service west of the Susitna River and some of their previous areas are no longer covered (the estimated coverage reduced from 100 miles to 25 miles). This is also the area where Shell Lake and Shell Mountain are located.

While we know this BETRS technology is antiquated and may need replacement, we also know that it is currently working and providing lifesaving critical communications. We simply have not received enough information at this time to determine what providers are covering what areas and need more time to do so. We just received the MTA Exhibit D coverage map the week of February 20, 2018 and it is an overhead satellite map that does not show who the customers are or what alternate coverage information is specifically possible for each person or area. It should be noted that MTA's dilatory filing of this map has hampered the timely gathering of information about what coverage other entities may be able to provide for the users in the area depicted in this map. Our position is that we must solidly show that alternate capabilities actually exist for these citizens and that it is not just conjecture or a generalized statement.

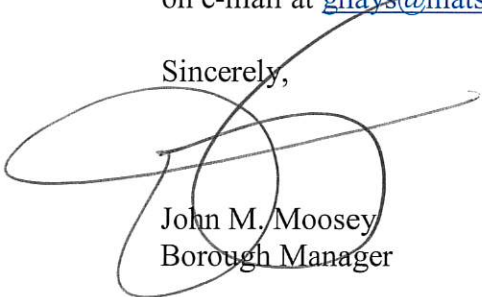
In summary, this service is vital to provide emergency lifesaving services in our Borough. Inadequate information is presently available to support the conclusion that alternative emergency communications services are available for many of our citizens.

Therefore, we request:

- A one-year extension of this capability by MTA which will give them time to address each of these 215 customers outlined in their application.
- MTA be required to provide affirmation that these proposed providers actually do provide coverage in these areas and not just a "potential alternative solutions" list where we know in most cases they do not offer service.
- A 30-day extension of the Public Notice period so that we can gather the specific information from these remote customers.

For additional information you may contact our Deputy Borough Manager, George Hays, on e-mail at [ghays@matsugov.us](mailto:ghays@matsugov.us) or by phone at (907) 861-8405.

Sincerely,



John M. Moosey  
Borough Manager