

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20544

March 8, 2019

Re: WC Docket No. 16-271, Revised Wireline Performance Commitments pursuant to 2016 Alaska Plan Order, footnote 14

Dear Ms. Dortch,

On March 1, 2019, in compliance with the filing requirements pursuant to the 2016 Alaska Plan Order, Mukluk Telephone Company, Inc. (MTC) submitted a revised Wireline Performance Commitments upon new fiber backhaul availability to the community of Nome.

This filing is made in response to additional information requested by the FCC Wireline Bureau.

- *By the end of the support term, will the fiber middle-mile service be available to all locations in Nome?*

MTC is prepared to offer voice and broadband service meeting the speeds committed to in the deployment plan and the relevant public interest obligations, within 10 business days to 99% of the locations in the City of Nome by the end of the support term as revised in this filing. Without further testing of every location, MTC cannot confirm the serviceability of a location until such time an effort to provision service is made to that location.

- *Could you provide some details on why the other communities will remain on performance limiting satellite middle mile?*

At this time, the City of Nome is the only community in the MTC study area fed by Fiber backhaul, all other communities within the MTC study area remain satellite fed. All the communities in the MTC study area are noncontiguous. Only one community has road access to Nome. This road is seasonal and the distance travels 73 miles northwest<sup>1</sup>.

MTC continues to offer best effort speeds at 1/.256 in these communities as originally filed. MTC continues to search for all opportunities, including the Rural Broadband Reconnect Program, to reach those communities with new fiber or hybrid microwave/fiber middle mile.

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<sup>1</sup> <https://www.adn.com/alaska-news/rural-alaska/2019/03/05/troopers-pull-out-of-search-for-snowmachiners-who-never-reached-nome/> Troopers spokesman Tim DeSpain said search parties have searched cabins along the Blodgett Highway that runs between Teller and Nome “multiple times” with no luck.

If and when access to new fiber or hybrid microwave/fiber middle mile facilities become available by a third party at an affordable cost point and MTC is able to move off of the existing satellite based middle mile transport, it will refresh the performance obligations accordingly<sup>2</sup>.

- *Could you revise the table to provide defined numbers for the locations alongside the percentages?*

Attached is a revised table providing number of locations expected to pass at the five and ten year benchmarks.

If there are any questions, please contact me directly at 1-907-563-2003.

Sincerely,

A handwritten signature in blue ink, appearing to read "David J. Goggins".

David J. Goggins  
President and General Manager  
TelAlaska, Inc.

Enclosure – Revised MTC Performance Obligations

E mail CC: Jesse Jachman  
Alexander Minard

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<sup>2</sup> FCC 16-115 Alaska Plan Order para 24-25

# Alaska Plan Performance Obligations

Mukluk Telephone Company, Inc

Note 1

Note 2

Note 3

		Base Locations 12/31/2015	Locations At Benchmark 12/31/15	Number of Locations Passed 12/31/2017	Percent of Locations At Benchmark Year 5	Number of Locations at Benchmark Year 5	Percent of Locations At Benchmark Year 10	Number of Locations at Benchmark Year 10
Middle Mile Facility	Speed to End User							
Satellite	1Mb/256k	2,628	95.00%	2,497	40.67%	1,069	42.38%	1,114
Hybrid Microwave-Fiber	4Mb/1Mb							
Fiber	10Mb/1Mb				0.88%	23	1.00%	26
Fiber	25Mb/3Mb				54.64%	1,436	56.00%	1,472
Total		2,628	95.00%	2,497	96.19%	2,528	99.38%	2,601

Note 1: Residential speeds.

Note 2: Base Locations in ETC's network as of 12/31/15. Source is 2010 US Census

Note 3: Year 1 is 2017