

Adopting a 25/3Mbps minimum standard for service would unnecessarily exclude many rural and remote areas from participation in the program. And similarly, should the Commission adopt rate caps, they must be chosen carefully to avoid excluding high cost, remote areas from the program.

II. Adopting 25/3Mbps minimum service standards would exclude remote areas of Alaska.

The Public Notice seeks comment on, “whether the Commission should impose minimum service standards and data thresholds,” adopting the Commission’s current benchmark of 25/3Mbps, and notes commenters encouraging unlimited data usage allowances.³ Although broadband deployment is advancing dramatically in Alaska, including through funding and construction of critical new middle mile links, in many remote areas of Alaska 25/3Mbps speeds are not yet available. Limiting the ECF to only those areas with access to 25/3Mbps speeds will exclude potential participants who are able to access lower, but still useful broadband speeds. Likewise, in remote areas of Alaska middle mile capacity is not available to support unlimited data usage, so limiting the ECF to areas where unlimited broadband is available would exclude participants who are able to offer more limited, but still useful data allowances.

III. Reasonable rates are affected by extreme high costs of remote areas in Alaska.

The Public Notice asks if the Commission should consider various example rates or caps to determine reasonable costs for monthly broadband services to the home.⁴ The \$9.95 and even \$50 rate cited in the Notice are much lower than rates which are necessary to provide service in remote areas of Alaska. Instead of adopting a universal rate which cannot account

³ Public Notice, p. 7.

⁴ Public Notice, p. 11.

for the high costs of offering broadband service in remote Alaska, the ECF could use the rates which broadband service providers already offer publicly for monthly broadband service to the home. This would allow students to access fixed broadband services at their homes at a rate which was previously established and which recognizes the significantly higher costs of offering broadband service in Alaska's remote areas.

IV. Conclusion

In order to be most effective in Alaska, the ECF should not adopt a minimum service level which will exclude remote areas and should adopt rates for monthly broadband service which have already been publicly offered.

Respectfully Submitted,

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