

April 19, 2018

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Rural Health Care Support Mechanism*, WC Docket No. 02-60

Dear Ms. Dortch:

On April 18, 2018 Chris Nierman of GCI Communication Corp. (“GCI”) and I met with Amy Bender, Wireline Legal Advisor, to Commissioner O’Rielly. On April 19, 2018, Chris Nierman, Tina Pidgeon, also of GCI, and I, met with Nirali Patel, Special Counsel to Chairman Pai. In both meetings we discussed points we made in previous comments in response to the NPRM.¹ Specifically, we urged that relief from the current cap is necessary for Funding Year 2017 and 2018. We also reiterated GCI’s proposals for longer-term reform of the Telecom Program, and we emphasized the need for a system to prioritize support under the Rural Health Care Program. As it currently stands, the pro-rata reductions in the Rural Health Care Program are unique in that they hit the highest cost to serve areas the hardest—in contrast to E-rate, which only has pro-rata reduction within a tier, with all higher discount tiers receiving full funding, and High Cost Loop Support, which reduces support by equal dollar amounts across all recipients. We urged rapid completion of the Funding Year 2017 commitments process, as we are already nine and a half months through that year, and also to move the long term reform process forward quickly so that these issues do not continue into Funding Year 2019.

Sincerely,



John T. Nakahata
Counsel to GCI Communication Corp.

cc: Amy Bender
Nirali Patel

¹ Comments of GCI Communication Corp., WC Docket No. 17-310 (filed February 2, 2018).