

April 27, 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 25, 2018, Tina Pidgeon and Chris Nierman of GCI Communication Corp. (“GCI”) and I met with Commissioner Jessica Rosenworcel and Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel. We discussed points we made in previous comments in response to the NPRM.¹ Specifically, we urged rapid completion of the Funding Year 2017 commitments process, as we are already nearly ten months through that year. The delay in completing the commitments and disbursement process is threatening to disrupt GCI’s ability to undertake key network improvements to improve wireless and wireline broadband in Alaska during the coming construction season. We urged that relief from the current cap is necessary for Funding Year 2017, and likely Funding Year 2018, given the large, continued increases in overall demand and the delayed announcement of the pro-rata reductions, which limits the ability of health care providers and service providers to accommodate reduced support levels. 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.

Sincerely,



John T. Nakahata
Counsel to GCI Communication Corp.

cc: Comm. Jessica Rosenworcel
Travis Litman

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