



Arctic Slope Telephone Association Cooperative, Inc.
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May 15, 2018

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

Re: AT&T Request for Waiver of Lower 700 MHz Band Interim and End-of-Term
Geographic Construction Benchmarks for Alaska B-Block License WQIZ597, WT
Docket No. 18-67

Dear Ms. Dortch,

Arctic Slope Telephone Association Cooperative, Inc. ("ASTAC") supports AT&T's Petition for Waiver of Lower 700 MHz Band build-out requirements, as amended in its Amended Petition for Waiver.¹ As a provider of wireless services in Alaska and lessee of a portion of the above-referenced 700 MHz spectrum licensed to AT&T, ASTAC is very familiar with the challenges that Alaska's harsh terrain and severe weather cause when constructing a wireless network to serve some of the most sparsely populated areas of the country. The refrain bears repeating: Alaska is unlike any other state. That uniqueness often calls for a different regulatory approach from what may be appropriate for the continental United States. The benchmark requirements for the build out of the 700 MHz B-Block in the cellular market area ("CMA") for the WQIZ597 license (CMA316) held by AT&T is one such case that warrants a different approach, and accordingly, as explained herein, ASTAC supports AT&T's waiver request.

ASTAC agrees with AT&T that rigid adherence to the geographic benchmarks for the 700 MHz spectrum in CMA316 does not serve the public interest, and that a flexible approach is necessary to address Alaska's uniqueness. ASTAC supports AT&T's request for a waiver that would apply a population-based coverage benchmark for the build out of the remote areas covered by AT&T's WQIZ597 license. As is the case for most of Alaska, CMA316 is an area that includes small communities dispersed over, and separated by, vast expanses of unpopulated land. The public interest requires that these rural communities, where the customers are, be served with wireless services, not that the vast expanses of unpopulated land be served. ASTAC has been working with AT&T for several years to help provide next generation wireless services to these rural communities in Alaska. Accordingly, ASTAC agrees that a population-based coverage benchmark is a better measure for determining whether the Commission's policy objectives for constructing the 700 MHz spectrum have

¹ Request for Waiver of Lower 700 MHz Band Interim and End-of-Term Geographic Construction Benchmarks for Alaska B-Block License WQIZ597, Amended Petition for Waiver, ULS File No. 0008116627 (filed March 12, 2018).



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been met, specifically that the spectrum is used and that service is provided to the majority of users in a licensed area.

ASTAC disagrees with the argument made by the Rural Wireless Association that denial of the waiver request would delay broadband deployment in Alaska.² In fact, denying AT&T's waiver request would halt ASTAC's ongoing deployment of its 700 MHz network because the leased area would revert to the Commission for re-licensing. ASTAC has ordered equipment and begun construction to utilize the 700 MHz band lease, and expects to begin operations this fall. The reversion of this license would leave many parts of rural Alaska without critical broadband wireless services for months, if not years, not only because of the time involved in re-licensing, but also because ASTAC would not have the benefits that come from its larger relationship with AT&T, notably shared resources and switching, that facilitate ASTAC being able to bring mobile broadband services to these rural areas of Alaska more quickly than other carriers who may acquire the license years from now. Indeed, a strict application of the geographic benchmarks for the build out of the 700 MHz spectrum in CMA316 would have the very real impact of delaying the pending deployment of wireless services to areas that need those services now and pushing the availability of wireless service to an unknown future date.

The public interest favors the deployment of wireless services to those areas of CMA316 that are lacking service as soon as possible. With a lease agreement in place and equipment on order, ASTAC will deploy wireless services to these unserved areas in the near term. ASTAC's ready plans for network construction combined with the uniqueness of Alaska's terrain and weather support the need to grant AT&T's petition in order to ensure that wireless service is available to remote areas of Alaska as soon as possible.

ASTAC urges the Commission to grant AT&T's petition.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jens Laipenieks", is written over a blue circular stamp or seal.

Jens Laipenieks
CEO / General Manager

cc: Gregory W. Whiteaker,
*Counsel to Arctic Slope Telephone
Association Cooperative, Inc.*

² See Comments of the Rural Wireless Association, Inc., WT Docket No. 18-67, at 7-8 (Apr. 30, 2018).