

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

Via ECFS

May 17, 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. MTC also submitted to the HUBB geocoded locations in the city of Nome where it has been able to offer increased broadband data speeds.

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

- *To follow up on this, the revised obligations you proposed have 23 locations at 10/1 and 1,436 locations at 25/3 by the end of year 5. I pulled the latest HUBB data, which shows the company having deployed to 79 locations at 10/1 and 1,642 locations at 25/3 in 2018, so already more than the proposed commitment. Can you help us understand the apparent discrepancy?*

MTC filed its revised Performance Obligations to comply with Alaska Plan Order requirements that participants must revise obligations upon access to new backhaul in its service area.

In filing its updated obligations, MTC used the same housing data as in its original filing to indicate where the new broadband data speeds would be available.

On March 1, our operations personnel completed its geocoded location data to include multi-dwelling housing locations. There were 1,354 records uploaded to the HUBB. 1,275 records uploaded at 25/3mpbs, of which there were 151 records identified with multiple units reflecting an additional 367 locations. It appears the additional count in the HUBB locations is reflective of the multi-dwelling housing units.

There were 79 records uploaded to the HUBB at 10/1mbps. MTC expects some of these locations to have 25/3 available by year 5 so the 10/1 number will be lower in year 5.

- *You may resubmit the proposed obligations if appropriate.*

Attached is a revised table in consideration of the additional locations as explained above, providing number of locations expected to pass at the five and ten year benchmarks. MTC continues to search for all opportunities to increase broadband availability throughout its study area.

If and when access to new fiber or hybrid microwave/fiber middle mile facilities become available 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>1</sup>.

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

Sincerely,



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>1</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	3,039	95.00%	2,887	38.29%	1,164	39.52%	1,201
Hybrid Microwave-Fiber	4Mb/1Mb							
Fiber	10Mb/1Mb				1.32%	40	1.00%	30
Fiber	25Mb/3Mb				57.68%	1,753	58.28%	1,771
Total		3,039	95.00%	2,887	97.29%	2,957	98.80%	3,002

Note 1: Residential speeds.

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

Note 3: Year 1 is 2017