

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

Via ECFS

June 7, 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. (Mukluk) submitted a revised Wireline Performance Commitments upon new fiber backhaul availability to the community of Nome.

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

*To the extent that GCI's TERRA Network is in the communities Mukluk serves, can you explain why service consistent with that type of middle-mile is not offered to end-users?*

The middle mile transport pricing using the TERRA network is not economically affordable at this time. Mukluk notes that the GCI TERRA Products Description and Pricing is available on GCI's website<sup>1</sup>. This document indicates within the Mukluk study area TERRA network locations are now in Elim, Golovin, Koyuk, Nome, Saint Michael, Shaktoolik, Stebbins, and White Mountain. The TERRA Ethernet pricing for the Mukluk locations besides Nome are indicated in Table 2. These rates at a 5 year discount are approximately \$6,384 per mbps per location per month. Mukluk would need to order approximately 20mbps at \$127,680 per location per month to provide broadband to that community. As an example, the community of Shaktoolik census data shows there are 70 residential households. If all 70 households were to subscribe to Mukluk broadband, the cost of middle mile transport alone would be \$1,824 per household per month. Mukluk finds this cost point is not affordable and continues search for access to new fiber or hybrid microwave/fiber middle mile facilities at an affordable cost point to increase broadband availability throughout its study area.

Mukluk understands that residential households in the TERRA network locations may subscribe directly to GCI internet service. We used the GCI internet availability and Internet Plan tool<sup>2</sup> to determine availability in the communities Mukluk serves. Using this tool demonstrates that GCI utilizing its TERRA network is not able to provide internet service greater than that available by

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<sup>1</sup> <https://www.gci.com/-/media/files/gci/regulatory/20190517gcierrapostingeffective.pdf?mod=20190523233731>

<sup>2</sup> <https://www.gci.com/internet>



satellite in any of our current satellite communities other than Shaktoolik. For example, in the communities of Elim, Koyuk, Stebbins, White Mountain, and Saint Michael GCI offers a Rural Internet plan with a maximum speed of 1mbps/.256mbps. In Shaktoolik, GCI does offer a Alaska Xtreme plan with a maximum speed of 10mbps/2mbps. Although GCI's TERRA network includes a location in Golovin, the tool shows no internet plans available there.

If and when Mukluk is able to move off of the existing satellite based middle mile transport, it will refresh the performance obligations accordingly<sup>3</sup>.

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

Sincerely,

A handwritten signature in black ink, appearing to read "David J. Goggins", written in a cursive style.

David J. Goggins  
President and General Manager  
TelAlaska, Inc.

Enclosure – copy GCI Terra Product Description and Pricing

E mail CC: Jesse Jachman  
Alexander Minard

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<sup>3</sup> FCC 16-115 Alaska Plan Order para 24-25