

June 24, 2016

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: *Connect America Fund et al.*, WC Docket Nos. 10-90, 05-337, 14-58,  
07-135, WT Docket No. 10-208, and CC Docket No. 01-92

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Dear Ms. Dortch:

On June 22, 2016, General Communication, Inc. (“GCI”) supplemented its proposed performance commitments associated with receiving enhanced support for its mobile wireless services as a competitive eligible telecommunications carrier (“CETC”) in Alaska. Whereas in prior filings GCI failed to make any firm commitment to deploy broadband capable of delivering 10/1 Mbps, the latest information GCI has provided indicates that the company “will deliver minimum service speeds of 10 Mbps download and 1 Mbps upload” in areas served by fiber-based middle mile (backhaul) facilities.<sup>1</sup>

Before the Commission accepts this commitment, it should consider why GCI has made no commitment to actually *deploy* fiber backhaul, given that GCI stands to receive the largest share of support from the Commission’s forthcoming revisions to high-cost support mechanisms for Alaska rate-of-return local exchange carriers (“ROR LECs”). This proceeding is replete with documentation of the need for fiber-based middle mile facilities to bring both fixed and mobile broadband capability to remote Alaska. Yet GCI continues to avoid any commitment to spend any portion of its expected CETC support toward the deployment of new fiber middle-mile facilities.

Similarly, GCI fails to commit that any middle mile it may build using federal high-cost support would be made available to other carriers on non-discriminatory terms, which would enable those other carriers to expand the availability of fiber-based broadband in their own service areas and bring the benefits of competition to the residents and businesses in these areas.

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<sup>1</sup> Letter to Marlene Dortch, FCC Secretary, from Julie Veach, Counsel to GCI, in WC Docket No. 10-90, WT Docket No. 10-208 (filed June 22, 2016).

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The Commission should hold GCI to a higher standard, and demand the same accountability from GCI that it demands of incumbent LECs receiving high-cost support.

Moreover, the Commission should acknowledge that GCI's most recent filing (as well as various prior filings in this proceeding) implicitly supports the need for Commission action to make fiber-based middle mile (or a combination of fiber and short-hop, high-speed terrestrial microwave links) available to all carriers serving remote communities in Alaska. If, as GCI indicates, broadband meeting the Commission's minimum standards, including speeds of 10/1 Mbps, cannot be made available in the absence of fiber backhaul, the Commission would be remiss to adopt any plan for remote Alaska without providing for increased investment in adequate and affordable terrestrial middle mile facilities.

As Alaska Communications has stated, the present proceedings give the Commission a historic opportunity – one that may not present itself again for a decade or more – to direct the appropriate use of CETC support for the greatest possible benefit in Alaska. Failure to seize this opportunity at this juncture would be a uniquely short-sighted failure.

Please direct any questions regarding this matter to me.

Very truly yours,



Karen Brinkmann

*Counsel to Alaska Communications*

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