

Attachment

	A	B	C	D	E	F	G	H	I	J	K	L
	Line Number	Customer	HCP Name	HCP#	FRN	Service Description	Network	Total Mbps	FRN Rural Rate/Month (All Rates Redacted)	Approach 1 Rural Rate Based on Open E-Rate Data	Approach 1 Methodology	ISSUES WITH APPROACH 1
2												
3	3	NSHC	Nome - East Campus	31287	1710510	Mbps MPLS	Satellite	40		\$63,999	There is no 40 Mbps E-rate satellite service in Alaska from GCI. The price is based on 50 Mbps Satellite services (similar by safe harbor) offered under E-rate by GCI in Alaska	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services.</p> <p>We believe the FCC staff relied on Southeast Island School District (FRN 1899031574, 1799090389). This service appears in the open source E-rate database as a 50/50 Mbps satellite service (\$63,999 MRC). This entry actually represents services for seven (7) different sites, none of which are symmetrical or dedicated satellite service. (See Contract SA 791-06). The sites are Thorne Bay, 50 Mbps best efforts over a resold terrestrial network, \$7,586/m (2) Howard Valentine, 10 Mbps best efforts over a resold terrestrial network, \$4,361/m 3) Barry Craig, 10 Mbps best efforts over a resold terrestrial network, \$3,052/m (4) Hollis School, 10 Mbps best efforts over a resold terrestrial network, \$3,143/m (5) Naukatit School, 10 Mbps best efforts over a resold terrestrial network, \$4,452 (6) Hyder School and Whale Pass School, 10/3 Mbps best efforts satellite service, \$34,394 (7) Port Alexander, 3/1.5 Mbps best efforts satellite service, \$7,011.</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. The rate used appears in the open source E-rate database as a rate for best efforts satellite services sold to E-rate customers, but a dedicated service is provided to the health care provider.</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules.</p> <p>4. This fails to account for the fact that when you buy more bandwidth, the total price increases, and instead averaged prices without weighting for the amount of bandwidth purchased (i.e. without creating an average rate per Mbps capacity).</p>
4	4	NSHC	Brevig Mission Clinic	10673	1710529	Mbps MPLS	Satellite	15		\$23,235	There is no 15 Mbps E-rate satellite symmetric service in Alaska from GCI. The price is based on the average price of 3 similar Satellite services (4x10 and 2x25 Mbps) offered under E-rate by GCI in Alaska	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services.</p> <p>While we have not been able to recreate the rate that the FCC staff arrived at based on the description "the average price of 3 similar Satellite services (4x10 and 2x25 Mbps) offered under E-rate by GCI in Alaska", we pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. The following erroneous data were used to establish this rate</p> <p>o Chugach School District (FRNs 1899039845, 1799034020, 1799034026, 1699069826). Three of these are listed in the open source E-rate database as 25/25 Mbps satellite services (\$41,537 MRC; \$41,537 MRC; \$27,110 MRC). These services are actually best efforts services over GCI s terrestrial fiber network. (See Contract SA-596-02). Two of the services are listed in the open source E-rate database as 10/10 Mbps satellite services (\$11,140 MRC; \$10,625 MRC). These service are actually best efforts services over GCI s terrestrial fiber network. (See Contract SA-596 for \$11,140 MRC; \$10,625 does not appear in the contract)</p> <p>o Southeast Island School District (FRN 1899071209). This service is listed in the open source E-rate database as a 25/25 Mbps satellite service (\$35,350 MRC). The service is actually a best efforts, asymmetrical 25/5 Mbps satellite service. (See Contract SA-791-06)</p> <p>o North Slope Borough School District (FRNs 1799048830, 1699024367). Two of these services are listed as 10/10 Mbps satellite services (both at \$24,500.00 MRC). These services are actually best efforts satellite service. (See Contract SA-520)</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. Several of the rates used appear in the open source E-rate database as rates for best efforts satellite services sold to E-rate customers, but a dedicated service is provided to the health care provider. This also uses rates for asymmetric services (more download than upload capacity) purchased by E-rate customers to propose rates for symmetric services purchased by health care providers. (See notes above)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules.</p> <p>4. This fails to account for the fact that when you buy more bandwidth, the total price increases, and instead averaged prices without weighting for the amount of bandwidth purchased (i.e. without creating an average rate per Mbps capacity).</p>

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	A	B	C	D	E	F	G	H	I	J	K	L
5	9	BBAHC	Chignik Lake Clinic	10973	1710574	Mbps MPLS	Satellite	25		\$34,324	Average E-Rate Price is based on 25 Mbps Satellite symmetric services offered by GCI across Alaska	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services.</p> <p>While we have not been able to recreate the rate that the FCC staff arrived at based on the description of "25 Mbps Satellite symmetric services offered by GCI across Alaska", we pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. The following erroneous data were used to establish this rate</p> <ul style="list-style-type: none"><li>o Chugach School District (FRNs 1899039845, 1799034020, 1799034026, 1699069826). Three of these services are listed in the open source E-rate database as 25/25 Mbps satellite services (\$41,537 MRC; \$41,537 MRC; \$27,110 MRC). The services are actually best efforts services over GCI s terrestrial fiber network. (See Contract SA-596-02).</li><li>o Southeast Island School District (FRN 1899071209). This service is listed in the open source E-rate database as a 25/25 Mbps satellite service (\$35,350 MRC). The service is actually a best efforts, asymmetrical 25/5 Mbps satellite service. (See Contract SA-791-06)</li></ul> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. Several of the rates used appear in the open source E-rate database as rates for best efforts satellite services sold to E-rate customers, but a dedicated service is provided to the health care provider. This also uses rates for asymmetric services (more download than upload capacity) purchased by E-rate customers to propose rates for symmetric services purchased by health care providers. (See notes above)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules.</p> <p>4. This fails to account for the fact that when you buy more bandwidth, the total price increases, and instead averaged prices without weighting for the amount of bandwidth purchased (i.e. without creating an average rate per Mbps capacity).</p>
6	11	BBAHC	Naknek Clinic	10975	1710601	Mbps MPLS	TERRA	15		\$30,885	The price is based on the average price of 10/10 and 20/20 Mbps MW services offered by GCI under E-rate in Bethel	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services.</p> <p>While we have not been able to recreate the rate that the FCC staff arrived at based on the description of the "average price of 10/10 and 20/20 MW services offered by GCI under E-rate in Bethel", we pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. The following erroneous data were used to establish this rate</p> <p>Northwest Arctic Borough School District (FRN 1899034925, 1899034927, 1899034929, 1799037228). Three of these services (FRNs 1899034925, 1899034927, 1899034929) are 20/20 Mbps best efforts TERRA services, each with a \$31,662.00 MRC. (See Contract SA-819-06) One of these services (FRN 1799037228) is listed as a 20/20 Mbps TERRA service with a \$41,180.00 MRC, but it is actually a 10/10 Mbps best efforts TERRA service circuits with a \$20,590 MRC. (See Contract SA-653) This 10/10 Mbps best efforts TERRA service also appears as a separate item in the open data (\$20,590.00 MRC).</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. Several of the rates used appear in the open source E-rate database as rates for best efforts TERRA services sold to E-rate customers, but a dedicated service is provided to the health care provider. (See notes above)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules. The average also fails to include one service listed in the open source E-rate database.</p> <p>Northwest Arctic Borough School District (FRN 1799037228). This is listed in the open source E-rate database as (and actually is) a 10/10 Mbps service provided over TERRA (\$71,500.00MRC). (See Contract SA-653).</p> <p>Lower Kuskokwim School District (FRN 1699011321). This is listed in the open source E-rate database as (and actually is) a 15/15 Mbps service provided over TERRA (\$66,900.00 MRC). (See Contract SA-432-4) This is a dedicated, symmetrical TERRA service. However, this service was never actually delivered to the customer. The customer ended up ordering 14 and 16 Mbps dedicated TERRA service instead, but these services do not appear in the open source E-rate database for some reason.</p> <p><input type="checkbox"/></p>

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	A	B	C	D	E	F	G	H	I	J	K	L
7	16	NSHC	Euksavik Clinic, Unalakleet	10684	1710617	Mbps MPLS	TERRA	10		\$20,590	The price is based on the average price of 10 Mbps MW (Terra) service offered by GCI under E-rate in Kotzebue	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services.</p> <p>While we have not been able to recreate the rate that the FCC staff arrived at based on the description of the "average price of 10 Mbps MW (Terra) service offered by GCI under E-rate in Kotzebue", we pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. The following erroneous data were used to establish this rate</p> <p>Northwest Arctic Borough School District (FRN 1799037228). This service is 10/10 Mbps best efforts TERRA services (\$20,590.00 MRC). (See Contract SA-653)</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. The rate used appears in the open source E-rate database as rates for best efforts TERRA services sold to E-rate customers, but a dedicated service is provided to the health care provider. (See notes above)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules. The average also fails to include one service listed in the open source E-rate database.</p> <p>Northwest Arctic Borough School District (FRN 1799037228). This is listed in the open source E-rate database as (and actually is) a 10/10 Mbps service provided over TERRA (\$71,500.00MRC). (See Contract SA-653).</p>
8	22	NSHC	Little Diomedee Clinic	11368	1710626	Mbps MPLS	Satellite	9		\$17,691	There is no 9 Mbps E-rate satellite symmetric service in Alaska from GCI. The price is based on the average price of 10 Mbps satellite services (similar) offered under E-rate by GCI in Alaska	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services.</p> <p>While we have not been able to recreate the rate that the FCC staff arrived at based on the description of the "average price of 10 Mbps satellite services (similar)", we pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. The following erroneous data were used to establish this rate</p> <p>o Chugach School District (FRN 1699069826). Two of the services listed in the open source E-rate database under this FRN are listed as 10/10 Mbps satellite services (\$11,140 MRC; \$10,625 MRC). These service are actually best efforts services over GCI s terrestrial fiber network. (See Contract SA-596 for \$11,140 MRC; \$10,625 not listed in the contract)</p> <p>o North Slope Borough School District (FRNs 1799048830, 1699024367). Two of these services are listed as 10/10 Mbps satellite services (both at \$24,500.00 MRC). These services are actually best efforts satellite service. (See Contract SA-520)</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. Several of the rates used appear in the open source E-rate database as rates for best efforts satellite services sold to E-rate customers, but a dedicated service is provided to the health care provider. This also uses rates for asymmetric services (more download than upload capacity) purchased by E-rate customers to propose rates for symmetric services purchased by health care providers. (See notes above)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules. The average also fails to include one service listed in the open source E-rate database.</p> <p>Southeast Island School District (FRN 1699072569). This is listed in the open source E-rate database as a 10/10 Mbps mixed service provided over satellite and GCI s terrestrial fiber network (\$155,831.00 MRC). ( Although the customer entered data erroneously, it s clear the FCC staff was cherry-picking rates rather than selecting all relevant comparable rates (under their methodology).</p> <p>4. This fails to account for the fact that when you buy more bandwidth, the total price increases, and instead averaged prices without weighting for the amount of bandwidth purchased (i.e. without creating an average rate per Mbps capacity).</p> <p>□</p>
9	24	ANTHC	Yuat Eliitaurviat Dental Training Clinic, Bethel	17709	1710628	Mbps MPLS	TERRA	5		\$10,700	The price is based on the average price of 5 Mbps MW (Terra) service offered by GCI under E-rate in Kotzebue	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services. The following erroneous data was used to establish this rate</p> <p>Northwest Arctic Borough School District (FRN 1799037228). This service is 5/5 Mbps best efforts TERRA services (\$10,700.00 MRC). (See Contract NEED CONTRACT)</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. The rate used appears in the open source E-rate database as a rate for best efforts TERRA services sold to E-rate customers, but a dedicated service is provided to the health care provider. (See notes above)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules. See also, GCI March 30, 2018 Submission, "5. TERRA-Satellite-Terrestrial Comps CONFIDENTIAL") for commercial comparable rates that were not used.</p>

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	A	B	C	D	E	F	G	H	I	J	K	L
10	25	BFC	Bethel Family Clinic	10892	1710634	Mbps MPLS	TERRA	6		\$10,700	The price is based on the average price of 5 Mbps MW (Terra) service offered by GCI under E-rate in Kotzebue. Note that 5 Mbps and 6 Mbps are similar	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services. The following erroneous data was used to establish this rate</p> <p>Northwest Arctic Borough School District (FRN 1799037228). This service is 5/5 Mbps best efforts TERRA services (\$10,700.00 MRC). (See Contract SA-653)</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. The rate used appears in the open source E-rate database as a rate for best efforts TERRA services sold to E-rate customers, but a dedicated service is provided to the health care provider. (See notes above)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules. See also, GCI March 30, 2018 Submission, "5. TERRA-Satellite-Terrestrial Comps CONFIDENTIAL") for commercial comparable rates that were not used.</p> <p>4. This fails to account for the fact that when you buy more bandwidth, the total price increases, and instead averaged prices without weighting for the amount of bandwidth purchased (i.e. without creating an average rate per Mbps capacity).</p>
11	27	EAT	Sand Point	10865	1712529	Mbps MPLS	Satellite	20		\$29,059	There is no 20 Mbps E-rate satellite symmetric service in Alaska from GCI. The price is based on the average price of similar Satellite services (4x10 and 2x25, 1x50 Mbps) offered under E-rate by GCI in Alaska	While we have not been able to recreate the rate that the FCC staff arrived at based on the description of the "the average price of similar Satellite services (4x10 and 2x25, 1x50 Mbps) offered under E-rate by GCI in Alaska", we pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. See response to line items 3, 4 and 9, which contain GCI's responses to similar methodology descriptions.
12	31	EAT	Nelson Lagoon Clinic	10869	1712977	Satellite MPLS	Satellite	10		\$17,691	Average E-Rate Price is based on 10 Mbps Satellite service offered by GCI in Alaska	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services.</p> <p>While we have not been able to recreate the rate that the FCC staff arrived at based on the description of the "10 Mbps satellite service offered by GCI in Alaska", we pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. The following erroneous data might have been used to establish this rate</p> <p>o Chugach School District (FRN 1699069826). Two of the services listed in the open source E-rate database under this FRN are listed as 10/10 Mbps satellite services (\$11,140 MRC; \$10,625 MRC). These services are actually best efforts services over GCI's terrestrial fiber network. (See Contract SA-596 for \$11,140 MRC; \$10,625 MRC is not listed in the contract)</p> <p>o North Slope Borough School District (FRNs 1799048830, 1699024367). Two of these services are listed as 10/10 Mbps satellite services (both at \$24,500.00 MRC). These services are actually best efforts satellite service. (See Contract SA-520)</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. Several of the rates used appear in the open source E-rate database as rates for best efforts satellite services sold to E-rate customers, but a dedicated service is provided to the health care provider. This also uses rates for asymmetric services (more download than upload capacity) purchased by E-rate customers to propose rates for symmetric services purchased by health care providers. (See notes above)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules. The average also fails to include one service listed in the open source E-rate database.</p> <p>□</p>
13	41	CATG	CATG Venetie Clinic	11015	1713680	Mbps MPLS	Satellite	12		\$17,691	There is no 12 Mbps E-rate satellite symmetric service in Alaska from GCI. The price is based on the average price of 10 Mbps satellite services (similar) offered under E-rate by GCI in Alaska	While we have not been able to recreate the rate that the FCC staff arrived at based on the description of the "average price of 10 Mbps satellite services (similar)", we pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. See response to line item 22, which contain GCI's responses to similar methodology descriptions.
14	45	CATG	CATG - Yukon Flats Health Center	11023	1714016	Mbps MPLS	Satellite	30		\$44,215	There is no 30 Mbps E-rate satellite symmetric service in Alaska from GCI. The price is based on the average price of similar Satellite services (2x25 and 1X50 Mbps) offered under E-rate by GCI in Alaska	While we have not been able to recreate the rate that the FCC staff arrived at based on the description of the "average price of similar Satellite services (2x25 and 1X50 Mbps) offered under E-rate by GCI in Alaska", we pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. See response to line items 3 and 4, which contain GCI's responses to similar methodology descriptions.

Attachment

	A	B	C	D	E	F	G	H	I	J	K	L
15	48	BBAHC	King Salmon Health Clinic	10989	1714708	Mbps MPLS	TERRA	12		\$43,450	The price is based on the average price of 15 Mbps and 10 Mbps MW (Terra) ("similar" services per Tier -3 Safe harbor) offered by GCI under E-rate in Bethel	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services.</p> <p>We have not been able to recreate the rate that the FCC staff arrived at based on the description of the "average price of 15 Mbps and 10 Mbps MW (Terra) ("similar" services per Tier -3 Safe harbor) offered by GCI under E-rate in Bethel." The data that we believe the FCC staff may have used, demonstrates the data relied on was erroneous. See response to line item 11.</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. Several of the rates used appear in the open source E-rate database as rates for best efforts TERRA services sold to E-rate customers, but a dedicated service is provided to the health care provider. (See notes above and in response to line item 11)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules. The average also fails to include one service listed in the open source E-rate database.</p> <p>Northwest Arctic Borough School District (FRN 1799037228). This is listed in the open source E-rate database as (and actually is) a 10/10 Mbps service provided over TERRA (\$71,500.00MRC). (See Contract SA-653).</p> <p>Lower Kuskokwim School District (FRN 1699011321). This is listed in the open source E-rate database as (and actually is) a 15/15 Mbps service provided over TERRA (\$66,900.00 MRC). (See Contract SA-432-4)</p>
16	129	YKHC	Hooper Bay Clinic	10197	1724158	Mbps MPLS	TERRA	20		\$41,180	The price is based on the average price of 20 Mbps MW (Terra) service offered by GCI under E-rate in Kotzebue	<p>1. This relies on erroneous information in the open source E-rate database, which makes the E-rate service appear to be similar to the health care provider service at a lower price. When corrected, the rates utilized were not for similar services.</p> <p>We pulled the data that we believe the FCC staff may have used, which demonstrates the data relied on was erroneous. The following erroneous data were used to establish this rate</p> <p>Northwest Arctic Borough School District (FRN 1799037228). This service is listed as a 20/20 Mbps TERRA service with a \$41,180.00 MRC, but it is actually a 10/10 Mbps best efforts TERRA service circuits with a \$20,590 MRC. (See Contract SA-653)</p> <p>2. This uses a dissimilar best efforts services to establish rates for dedicated services. Several of the rates used appear in the open source E-rate database as rates for best efforts TERRA services sold to E-rate customers, but a dedicated service is provided to the health care provider. (See notes above)</p> <p>3. This fails to average all relevant comparable rates, including the commercial comparable rates explicitly required by FCC rules. The average also fails to include one service listed in the open source E-rate database.</p> <p>Northwest Arctic Borough School District (FRN 1799037228). This is listed in the open source E-rate database as (and actually is) a 10/10 Mbps service provided over TERRA (\$71,500.00MRC). (See Contract SA-653).</p> <p>Lower Kuskokwim School District (FRN 1699011321). This is listed in the open source E-rate database as (and actually is) a 15/15 Mbps service provided over TERRA (\$66,900.00 MRC). (See Contract SA-432-4) This is a dedicated, symmetrical TERRA service. However, this service was never actually delivered to the customer. The customer ended up ordering 14 and 16 Mbps dedicated TERRA service instead, but these services do not appear in the open source E-rate database for some reason.</p>

## Attachment

	A	B
1	<b>Color Code</b>	
2		
3	Rows highlighted in this color indicate one of the iterations of a rural rate for TERRA services proposed by the FCC based on the Approach 1 methodology. GCI has identified issues with each iteration in each of the highlighted rows. Subsequent rows of FRNs that rely on th same iteration are cross-referenced to a highlighted row.	
4	Rows highlighted in this color indicate one of the iterations of a rural rate for Satellite services proposed by the FCC based on the Approach 1 methodology. GCI has identified issues with each iteration in each of the highlighted rows. Subsequent rows of FRNs that rely on th same iteration are cross-referenced to a highlighted row.	