



HARRIS, WILTSHIRE
& GRANNIS LLP

July 18, 2019

Ex Parte via ECFS

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

Re: Promoting Telehealth and Telemedicine in Rural America, WC Docket No. 17-310

Dear Ms. Dortch:

On July 17, 2019, I, counsel to GCI Communication Corp. (“GCI”), spoke with Jamie Susskind, Chief of Staff to Commissioner Carr. On July 18, 2019, I spoke with Travis Litman, Chief of Staff to Commissioner Rosenworcel. In those conversations, I discussed points summarized in my ex parte letter of July 17, 2019 and incorporated by reference herein. In addition, I stated that GCI is on record as opposing the grouping of off-road Alaska together with other rural areas in Alaska for the purposes of establishing or limiting the level of the rural rate, as this one-size-fits-all approach with dissimilar areas would tend to channel support to lower cost areas within that grouping.¹

GCI is also on record as supporting use of rurality tiers for prioritization.² These positions are consistent. Prioritization does not raise the same issues because prioritizing simply sets an order for which some locations get funded before other locations. It does not matter whether locations within the same tier have similar costs to serve; what is relevant for prioritization is that the locations in the higher priority tier are generally higher need than the next lower tier. Comparability of locations for rural rate setting and prioritization of locations are fundamentally different exercises, especially within the proposed “Extremely Rural” tier.

I also suggested that the Commission consider addressing the practical, operational issues raised in my July 17 ex parte by (i) adopting or having a mechanism to create more granular rurality tiers that match the underlying costs to serve and available service delivery technologies; (ii) ensuring that USAC would actually have the data and the ability to distinguish between differing levels of quality of service; and (iii) auditing and correcting the data USAC will use in its database. Other issues also likely need to be addressed, including transparency of the rural rate setting process.

¹ See Comments of General Communication, Inc. at 40, WC Docket No. 17-310 (filed Feb. 2, 2018).

² *Id.* at 43–44.

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Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata".

John T. Nakahata
Counsel to GCI Communication Corp.

cc: Jamie Susskind
Travis Litman
Preston Wise
Arielle Roth
Randy Clarke
Trent Harkrader