

REDACTED – FOR PUBLIC INSPECTION

August 29, 2018

VIA ECFS

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

Re: *Connect America Fund Phase II Challenge Process*, WC Docket No. 14-93; *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

In accordance with the *Third Protective Order* for the above-referenced proceedings, GCI Communication Corp. (“GCI”) hereby submits a redacted version of the attached supplement to its first challenge in the above-referenced proceedings.

GCI has designated the shapefiles contained in the attached flash drive for confidential treatment pursuant to the *Third Protective Order* in WC Docket No. 10-90 *et al.*¹ This redacted version contains the entire contents of the supplement except the shapefiles.

Pursuant to the *Third Protective Order*, GCI is filing a redacted version of its supplement electronically via ECFS, one copy of the confidential version with the Secretary (with a flash drive containing the confidential shapefiles), and two copies of the redacted version with the secretary. GCI is also providing password-protected flash drives containing the confidential data to Wireline Competition Bureau staff Talmage Cox and Dangkhua Nguyen.

Please contact the undersigned if you have questions.

Sincerely,



Julie A. Veach
Counsel to GCI Communication Corp.

cc: Alex Minard
Talmage Cox
Dangkhua Nguyen

¹ *Connect America Fund Phase II Challenge Process et al.*, Third Protective Order, DA 12-1418, 27 FCC Rcd. 10,276 (Wireline Comp. Bur. 2012) (“*Third Protective Order*”).

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August 29, 2018

Ex Parte

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

Re: *Connect America Fund Phase II Challenge Process*, WC Docket No. 14-93; *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

At the request of Wireline Competition Bureau staff, GCI Communication Corp. (“GCI”) provides the following additional data regarding its challenge to Alaska Communications’ (“ACS”) first filed set of locations in partially served census blocks that it proposes to serve in fulfillment of its Connect America obligations.

First, GCI provides a flash drive containing the shapefiles depicting its cable node boundaries.²

Second, GCI provides a spreadsheet with data identifying which ACS locations are within a GCI cable node boundary, the nearest address to the ACS location, and the distance of the nearest address to the ACS location. As explained in GCI’s challenge, GCI obtained the latitude/longitude coordinates of each address in the relevant communities of Alaska in the OpenAddresses database.³ For each location ACS proposed to serve, GCI compared the latitude/longitude provided by ACS to the OpenAddresses database to identify the address nearest to the coordinates provided by ACS. The spreadsheet lists, for each proposed ACS location, the nearest street address in OpenAddresses and the distance in meters between the latitude/longitude of the address as shown in OpenAddresses and the latitude/longitude provided

² See General Communication, Inc.’s Challenge to Alaska Communications Systems’ Proposed Eligible Locations in Partially Served Census Blocks, WC Docket Nos. 14-93 and 10-90 (filed Mar. 22, 2018) (“GCI Challenge Filing”). As the boundaries are not routinely released outside of GCI and its agents in electronic form, GCI is submitting these boundaries pursuant to the protective order applicable in this proceeding. See *Connect America Fund et al.*, Third Protective Order, DA 12-1418, 27 FCC Rcd. 10,276 (Wireline Comp. Bur. 2012) (“Third Protective Order”).

³ See openaddresses.io.

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by ACS. The vast majority of the latitude/longitude coordinates provided by ACS correlate very closely to the latitude/longitude associated with an address in the OpenAddresses database: as shown in the table below, for a third of the ACS locations that are within GCI cable node boundaries, the distance between the coordinates as provided by ACS and the coordinates associated with the nearest address in OpenAddresses is 1 meter or less, and for over 80 percent of comparisons the distance is less than 25 meters. Many of the locations on ACS's list are on large parcels of land, so two different coordinates can be 25 or more meters apart and still be on the same parcel.

Distance of ACS Locations Within GCI Cable Node Boundaries to Nearest Address

Distance	# of locations	% of locations	Cumulative % of locations
1 meter or less	1016	33%	33%
more than 1 meter but less than 25 meters	1503	48%	81%
25 meters or more	580	19%	100%
Total	3099	100%	

Using the address analysis described above, GCI also compared the ACS coordinates as matched to addresses with the addresses of GCI's cable internet subscribers and found 1605 matches. In other words, of the 3099 ACS locations within GCI cable node boundaries, over half of the nearest addresses correspond to the addresses of existing GCI cable Internet subscribers. All these GCI cable internet customers subscribe or could subscribe to service of at least 10 Mbps/1 Mbps.⁴ In fact, 86 percent of these GCI cable internet subscribers have the option to subscribe to GCI's 1 Gbps/50 Mbps service, and the remainder can subscribe to service of 250 Mbps/15 Mbps.

As explained in its challenge filing, GCI relies primarily on its cable node boundary data as the basis of its challenge. The purpose of the comparison between ACS's proposed locations and GCI's current subscribership—and therefore the purpose of the proximity data provided with this filing—is to support GCI's other evidence that it already offers qualifying service to most of the locations ACS identified as “unserved.”

⁴ See GCI Challenge Filing at 5-7 for a more detailed discussion of GCI's cable internet subscribers and the services to which they subscribe.

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Please contact me if you have any questions.

Sincerely,



Julie A. Veach

Counsel to GCI Communication Corp.

Attachment (proximity spreadsheet), and flash drives with confidential version (shapefiles)

cc: Alex Minard
Talmage Cox
Dangkhua Nguyen

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CERTIFICATE OF SERVICE

I, Remington Pool, hereby certify that on this 29th day of August, 2018, I caused true and correct copies of the foregoing August 29, 2018 Letter in WC Docket Nos. 14-93 and 10-90 to be served by U.S. mail, first-class prepaid and electronic mail upon:

Karen Brinkmann
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/s/

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