



November 6, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

RE: **Ex parte filing** in WC Docket No. 16-271

Dear Ms. Dortch:

On November 2, Christopher Spencer, CEO from Copper Valley Telephone and the undersigned from GVNW Consulting, Inc. (GVNW) conducted separate *ex parte* meetings with Amy Bender from Commissioner O’Rielly’s office and Jamie Susskind from Commissioner Carr’s office. On the same day, we also met with Chief of Staff Travis Litman from Commissioner Rosenworcel’s office and Claude Aiken from Commissioner Clyburn’s office.

The *ex parte* meetings included a discussion of Copper Valley’s excellent progress on its Alaska Plan performance obligations in 2017, highlighted by the installation of 150 miles of fiber. With the upcoming deadline for the initial performance obligation report, we expressed our appreciation that Alaska Plan carriers will have access to the HUBB reporting portal beginning on November 6.

Maintaining adequate federal universal service funding (FUSF) is required for implementation of all of the Commission’s universal service initiatives, including the Alaska Plan. In this regard, we expressed support for maintaining at least the overall budget level of \$4.5 Billion into 2018 pending further study, and expressed our concern regarding the cumulative year over year effect of the loss of a net interest annual accrual of \$53.5 million on FUSF deposited in the bank. (As shown on page 29, Combining Supplemental Schedules of Changes in Net Assets Applicable to the Federal USF in the 2016 USAC annual report, \$55M interest less \$1.5M bank fees, rounding to the nearest half million.)

We also touched lightly on what the proper metric is for broadband target speeds in the country, including for carriers facing the unique challenges posed by the circumstances in Alaska.

As required by the Commission’s rules, this *ex parte* record is now filed in the above referenced docket. If there are any questions, please call me on 503.612.4409.

Respectfully submitted,

Via ECFS 11/6/17

Jeffry H. Smith
President and CEO

Copy to

Amy Bender, FCC
Jamie Susskind, FCC
Claude Aiken, FCC
Travis Litman, FCC
Chris Spencer, CVT
Mike Romano, NTCA
Gerry Duffy, Blooston (WTA)