

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
Developing a Unified Intercarrier)	CC Docket No. 01-92
Compensation Regime)	

**REPLY COMMENTS OF GENERAL COMMUNICATION, INC. IN RESPONSE TO
THE PUBLIC NOTICE TO REFRESH THE RECORD ON INTERCARRIER
COMPENSATION REFORM RELATED TO THE NETWORK EDGE, TANDEM
SWITCHING AND TRANSPORT, AND TRANSIT**

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TABLE OF CONTENTS

I.	INTRODUCTION AND EXECUTIVE SUMMARY.....	1
II.	ALASKA’S NETWORKS ARE DIFFERENT FROM TYPICAL NETWORKS IN THE LOWER 48	2
III.	FOR ALASKA, THE COMMISSION SHOULD DESIGNATE THE DEFAULT NETWORK EDGE AT THE LOCAL EXCHANGE OR MOBILE SWITCHING CENTER AND REQUIRE INTERCONNECTION UPON REQUEST	4
A.	The Default Network Edge Should Be the Terminating Carrier’s End Office or a CMRS Provider’s Mobile Switching Center in Most Circumstances	4
1.	The Default Network Edge in Alaska for Fixed Networks.....	4
2.	The Default Network Edge in Alaska for Mobile Networks	7
B.	Alternative Network Edges in Alaska.....	8
C.	All Terminating Carriers Should Offer Interconnection at the Default Network Edge or the Alternative Network Edge	10
1.	Benefits of mandatory interconnection at the network edge	10
2.	Section 251(a) provides authority to require interconnection at the network edge.	12
IV.	CONCLUSION.....	14

I. INTRODUCTION AND EXECUTIVE SUMMARY

On behalf of itself and its operating subsidiaries, General Communication, Inc. (“GCI”) submits these reply comments in response to the *Public Notice* inviting parties to refresh the record regarding implementation of the intercarrier compensation reforms adopted in the *Transformation Order*.¹

As described in detail below, Alaska’s communications networks are different from those in the Lower 48 in ways that matter for intercarrier compensation. There are no tandem switches and no LATAs, and most calls between exchanges require the use of interexchange facilities. Intercarrier compensation rules that rely on Lower 48 architecture will cause confusion and disputes when carriers try to apply them in Alaska. GCI offers an Alaska-specific proposal for defining the network edge for purposes of bill-and-keep that would provide clarity to all parties and move Alaska toward a sensible bill-and-keep system.

1. Every fixed carrier has a default network edge at the end office serving the called party. If a terminating carrier has no end office in the exchange serving the called party, its default network edge is its point of interconnection in the exchange serving the called party.
2. As a general rule, every mobile carrier has a default network edge at its mobile switching station in Alaska; for exchange of certain locally-numbered traffic with

¹ *Parties Asked to Refresh the Record on Intercarrier Compensation Reform Related to the Network Edge, Tandem Switching and Transport, and Transit*, Public Notice, 32 FCC Rcd. 6856 (Wireline Comp. Bur. 2017) (“*Public Notice*”); *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 17,663 (2011) (“*Transformation Order*”), *pets. for review denied sub nom. in re: FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014).

rural ILECs, CMRS providers must establish a network edge within the rural ILEC's exchange serving the rural ILEC's customer.

3. Terminating carriers may establish their network edge in an alternative location under certain circumstances but are responsible for all costs to transport and terminate traffic from their alternative edge to the called party.
4. Terminating carriers must offer direct interconnection at the default network edge or direct or indirect interconnection at an alternative network edge. If the carrier refuses to offer direct interconnection to a requesting carrier at the default network edge, then it may not charge originating transport to the requesting carrier to any point outside of its local service area for that exchange. Under either approach, the terminating carrier bears the financial responsibility to carry the traffic from the default or alternative network edge to the called party.
5. Providers may establish by mutual agreement other points of interconnection and financial responsibility arrangements.

II. ALASKA'S NETWORKS ARE DIFFERENT FROM TYPICAL NETWORKS IN THE LOWER 48

Alaska's communications network developed differently from those in the Lower 48. The Bell System never reached Alaska. The U.S. military constructed facilities for communication in the early part of the 20th century to connect military outposts.² The network, which became known as the Alaska Communications System, expanded landline operations at the dawn of World War II to avoid interception of radio communications by the Japanese.³ The

² See Heather E. Hudson, *CONNECTING ALASKANS*, at 14-16 (2015) ("CONNECTING ALASKANS").

³ See *id.* at 25-27.

military and its contractors continued expanding facilities to other portions of Alaska until President Nixon (and subsequently the Commission) approved the sale of the Alaska Communications System from the military to RCA in 1969.⁴ RCA's subsidiary Alascom, was the sole authorized provider of interexchange service. At this point, many Bush communities remained without interexchange service, and in some cases without local service.⁵

After disputes over how best to bring interexchange service to remote villages, in the mid-1970s Alascom installed 100 earth stations to provide interexchange communications via satellite, on a monopoly basis.⁶ GCI was founded in 1979 with the goal of providing competitive interexchange services.⁷ In 1982, the Commission authorized GCI to provide competitive interstate interexchange services,⁸ but it was not until 1991 that the Alaska Public Utilities Commission (now the Regulatory Commission of Alaska) authorized GCI to provide intrastate interexchange services, bringing competition to this market for the first time.⁹

As a result of the late development of interexchange service in Bush communities, their often vast distances from each other, and the lack of terrestrial interexchange facilities that

⁴ See *Applications of RCA Alaska Communications Inc. etc.*, Memorandum Opinion and Order, 22 F.C.C.2d 200, 200 ¶ 1, 209, ¶ 24 (1970) (noting that the sale of Alaska Communications System to RCA Alaska Communications was approved on June 25, 1969, and approving in principle the transfer of control pursuant to sections 214 and 309).

⁵ See *CONNECTING ALASKANS* at 57-60.

⁶ See *id.* at 116; *MTS-WATS Market Structure Inquiry*, Second Report and Order, 92 F.C.C.2d 787 (1982) (noting that “Alascom has been the sole supplier of interstate and intrastate interexchange service in Alaska since 1971”) (“*MTS-WATS Alaska Order*”).

⁷ See GCI, Milestones, <https://www.gci.com/about/milestones>.

⁸ See *MTS-WATS Alaska Order* at 787 (permitting new carriers to enter the Alaskan interstate voice market).

⁹ See *GCI Communication Corporation*, Order Approving Application Subject to Conditions and Requiring Tariff Filing, U-91-11(1) (RCA 1991) (granting GCI a certificate of public convenience and necessity to furnish intrastate interexchange service).

persists today in some areas, there are no tandem switches in Alaska, and there was no need for LATAs. Every ILEC interconnects with one or more IXC's in each of its local exchanges, except in a few cases where the Regulatory Commission of Alaska has authorized extended area service. These interexchange links remain an important part of distributing and delivering all telecommunications traffic, whether wireline or wireless, around Alaska. These real differences must be recognized in the Commission's approach to intercarrier compensation in Alaska for the benefits of bill-and-keep to be realized.

III. FOR ALASKA, THE COMMISSION SHOULD DESIGNATE THE DEFAULT NETWORK EDGE AT THE LOCAL EXCHANGE OR MOBILE SWITCHING CENTER AND REQUIRE INTERCONNECTION UPON REQUEST

A. The Default Network Edge Should Be the Terminating Carrier's End Office or a CMRS Provider's Mobile Switching Center in Most Circumstances

1. The Default Network Edge in Alaska for Fixed Networks

The record reflects support for the notion that the originating caller (or carrier) should bear the financial responsibility to deliver traffic to the terminating carrier's network.¹⁰ Specifically for Alaska, GCI proposes that the Commission designate the default "network edge" as the end office or local exchange serving the called party.¹¹ Originating callers or carriers (including CMRS providers and LECs partnering with VoIP providers) would then be

¹⁰ See Comments of AT&T Services Inc. to Refresh the Record, WC Docket No. 10-90, CC Docket No. 01-92, at 5 (filed Oct. 26, 2017) ("AT&T Comments"); Comments of CenturyLink, WC Docket No. 10-90, CC Docket No. 01-92, at 9 (filed Oct. 26, 2017) ("CenturyLink Comments"); Comments of ITTA – the Voice of America's Broadband Providers, WC Docket No. 10-90, CC Docket No. 01-92, at 2 (filed Oct. 26, 2017) ("ITTA Comments").

¹¹ LECs partnering with VoIP providers typically obtain numbering resources that VoIP providers can distribute to their customers. Whenever a LEC obtains numbering resources for this purpose, it should establish a network edge within the local service area associated with those numbers.

responsible for delivering traffic to that specific exchange or end office. In Alaska, where there are no tandems, this is necessary to prevent terminating LECs from bearing the cost of interexchange services just to bring traffic from one of its end offices to the end office serving the called party.¹²

The Alaska-specific approach that GCI suggests is a tailored version of the national approach called for by some commenters. CenturyLink suggests that the network edge should be “the switch that serves the end user (i.e. the end office or its equivalent).”¹³ ITTA suggests designating the called party’s end office (for ILECs) or a CLEC’s point of presence.¹⁴ And AT&T submitted a proposal in 2012 to establish as the network edge “(1) End Office serving the called party, when that end office does not subtend a tandem switch owned by the Terminating Carrier. (2) Tandem serving the called party’s End Office, when the Terminating Carrier owns the tandem switch serving that end office. (3) Point of Presence (‘POP’), when the Terminating Carrier does not have a switch in the LATA where the traffic is terminated. . . .”¹⁵ Each of these proposals puts the cost of getting the call to the terminating carrier at a point that does not burden the terminating carrier with costs to transport the traffic, but also does not allow the terminating

¹² A LEC’s default network edge must be within the local exchange serving the called party. To the extent that a LEC utilizes remote switches in some areas that subtend a host switch, its default network edge can be the host switch if within the local exchange serving the called party. Otherwise, it may designate the host switch as an alternative network edge as described below in Section III.C and bear financial responsibility for transport between the host and remote switches, including for any direct trunked transport or other dedicated transport.

¹³ See CenturyLink Comments at 9.

¹⁴ See ITTA Comments at 4.

¹⁵ Comments of AT&T, WC Docket No. 10-90 et al. (filed Feb. 24, 2012), Appendix A, AT&T’s Bill-and-Keep Framework for Terminating PSTN Traffic at 1-2 (“AT&T Framework”). Below we discuss the fourth prong of AT&T’s network edge proposal regarding CMRS traffic. See *infra* at 7.

carrier to charge for transport that the originating carrier does not wish to purchase. As AT&T states, “the party that has the financial responsibility to carry traffic to or from a network edge has the unfettered freedom to choose how, and by what arrangements, that party will carry the traffic on its side of the edge.”¹⁶

An Alaska-specific approach will avoid the confusion and poor results that would result from attempting to apply rules designed for more typical network architecture. For example, AT&T’s proposal from 2012 identifies three possible default network edges on a wireline network, but with reference to Lower 48 architecture. The first is the “End office serving the called party, when that end office does not subtend a tandem switch owned by the Terminating Carrier.”¹⁷ This is similar to what GCI is proposing for Alaska—the end office serving the called party—but the reference to tandem switches may cause confusion as there are no tandem switches in Alaska. AT&T’s second option is the “Tandem serving the called party’s End Office, when the Terminating Carrier owns the tandem switch serving that end office.”¹⁸ Again, because there are no tandem switches in Alaska, this is not an option, and should not be adopted as a possible default network edge for Alaska. Finally, the third option is a “Point of Presence (‘POP’), when the Terminating Carrier does not have a switch in the LATA where the traffic is terminated.”¹⁹ GCI agrees with the principle of this proposal. But references to a LATA are wrong for Alaska, which does not have separate LATAs and for which a LATA was never an operational concept because Alaska was never served by a Bell Company. A simple, clear approach for Alaska that achieves the ultimate goal of advancing bill and keep would set the

¹⁶ AT&T Comments at 3.

¹⁷ AT&T Framework at 1 (emphasis deleted).

¹⁸ *Id.* at 2 (emphasis deleted).

¹⁹ *Id.* (emphasis deleted).

default network edge for traffic terminating to LECs as the end office serving the called party or, if the LEC has no switch in the called party's exchange, the LEC's point of presence in that exchange.

2. The Default Network Edge in Alaska for Mobile Networks

As a general rule, CMRS providers terminating traffic in Alaska should establish their default network edge at their MSC(s) in Alaska. This is similar to suggestions from other commenters proposing national rules but makes clear that the MSC must be in Alaska and does not refer to LATAs or service areas.²⁰ Under this proposal, the originating carrier would have the financial responsibility to bring traffic bound for a CMRS subscriber to the CMRS provider's MSC, at which point the CMRS provider would identify the tower currently serving the subscriber's device and route the call to that tower using whatever transport arrangements it has in place. From the MSC, the CMRS provider would bear financial responsibility to terminate the call, even if that requires purchasing services from an IXC or other carrier to get the call to the right tower.

GCI believes that an adjustment to the general rule may be appropriate for Alaska's rural ILECs, which today do not pay the costs of transport to a CMRS provider's MSC when the CMRS provider has a point of interconnection within the ILEC's local exchange. Specifically, in Alaska, a CMRS provider that has numbering resources associated with a particular local service area should be required to establish or maintain a network edge within that ILEC's local exchange for purposes of calls to and from numbers associated with that exchange. As a result,

²⁰ See AT&T Framework at 2; ITTA Comments at 4; Comments of Peerless Network, Inc. et al., WC Docket No. 10-90, CC Docket No. 01-92, at 9 (filed Oct. 26, 2017) (suggesting the MSC within the LATA as the presumptive network edge for termination to CMRS subscribers). If a CMRS provider offers facilities-based service in Alaska, but has no MSC in Alaska, that provider should be required to establish an edge in Alaska.

if the ILEC's customer makes a call to a local CMRS number, the ILEC will carry the call to the CMRS provider's local point of interconnection, at which point the CMRS provider will bear the cost of transporting the call back to its MSC (if necessary) or otherwise routing the call to its customer. Similarly, if the CMRS provider's customer dials a number local to that ILEC, the CMRS provider is responsible for transporting the call from its customer to its point of interconnection within the ILEC's local exchange, at which point the ILEC terminates the call. For all other calls—those from an ILEC customer to a non-local CMRS number, or those from a CMRS customer to a non-local ILEC customer—the general network edge rules should apply: For a call from an ILEC customer to a non-local CMRS number, the ILEC is financially responsible for delivering the call to the CMRS provider's MSC. And for a call from a CMRS provider to a non-local ILEC number, the CMRS provider is responsible for delivering the call to the ILEC's network edge.

This modification reflects Alaskan network realities. A single CMRS network edge for the state would result in a substantial shift of transport costs from CMRS providers to rural ILECs, given that the rural exchanges are generally connected to each other via interexchange facilities. On the other hand, a two-way edge for calls bound for a CMRS provider would shift responsibility for the interexchange portion of non-local calls from the calling party to the called party. GCI continues to evaluate approaches to establishing the edge for wireless traffic and consider whether the above modification should be phased out over time.

B. Alternative Network Edges in Alaska

GCI believes that the “Alternative Edge” proposal from AT&T in 2012 would likely serve Alaska well. AT&T proposed that a terminating carrier be permitted to designate an “Alternative Edge” in two circumstances: first, if it is not technically feasible for the terminating carrier to interconnect directly at the default network edge, and second, if the terminating carrier

is not subject to mandatory direct interconnection pursuant to Section 251(c) and refuses to interconnect directly at the default network edge. In those cases, under AT&T's proposal, the terminating carrier must designate an Alternative Edge and bear the costs of transporting the call from the Alternative Edge to the called party.²¹ While AT&T proposed as a national requirement that an "Alternative Edge" must be within the terminating carrier's service territory, GCI continues to consider whether this approach is feasible in Alaska, where service territories can be collections of non-contiguous exchanges connected by interexchange facilities.²²

GCI suggests one additional requirement for Alaska that should apply to carriers that refuse direct interconnection at the default network edge (as discussed in Section III.C below): a carrier that will not provide direct interconnection at its default network edge should be financially responsible for transport of traffic on its side of the alternative network edge, both for terminating access and for originating access. This requirement would prevent ILECs from designating an alternative network edge in order to increase originating access charges. For example, if an ILEC designated an alternative network edge in an area far from its end office, the ILEC could include the costs of transport from its default network edge to the alternative network edge in the originating access it charges to the IXC (i.e., mileage-pumping). If the IXC can interconnect directly at the end office, the IXC can select the most cost-effective way to transport the call from the end office to the called party's carrier—either using its own facilities or using transport provided by the ILEC or a third party. It is not constrained to use and pay for

²¹ AT&T Framework at 2-4.

²² See AT&T Framework at 2 ("If interconnection is not technically feasible at the location that should be the Terminating Carrier's Network Edge under § 1.d.ii above, or if the Terminating Carrier is exempt from 47 U.S.C. § 251(c) and does not offer interconnection at its Network Edge, the Terminating Carrier must designate a different location in its service territory as its 'Alternative Edge.'").

the transport from the ILEC to the alternative edge, which may be a very inefficient route. To achieve the same result for carriers that refuse direct interconnection at the network edge, the Commission should preclude them from charging originating transport.

C. All Terminating Carriers Should Offer Interconnection at the Default Network Edge or the Alternative Network Edge

1. Benefits of mandatory interconnection at the network edge

GCI proposes interconnection as a necessary corollary to its network edge proposal. Specifically, GCI proposes that in Alaska, every terminating carrier—including ILECs, CLECs, RLECs, CMRS providers, and LECs providing wholesale services to VoIP providers—provide direct interconnection with any carrier willing to bring its traffic directly to the network edge. Others had similar ideas for the Lower 48: GCI agrees that terminating LECs and CMRS providers should be required to establish direct interconnection at the network edge with any carrier willing to bring traffic to that point.²³ In addition, these same carriers should be required to permit direct interconnection for 8YY traffic at the same points; that is, a provider that originates 8YY traffic should permit IXCs or other 8YY service providers to pick up that traffic at the same network edge for delivery to the 8YY customer.²⁴ This is consistent with treating 8YY calls as terminating traffic, as GCI and others have recently suggested.²⁵

²³ See CenturyLink Comments at 8; ITTA Comments at 9.

²⁴ See ITTA Comments at 11.

²⁵ See Comments of General Communication, Inc, in Response to Public Notice Asking Parties to Refresh the Record Regarding 8YY Access Charge Reform, WC Docket Nos. 10-90 & 07-135, CC Docket No. 01-92 (filed July 31, 2017); *see also, e.g.*, Comments of AT&T, WC Docket Nos. 10-90 & 07-135, CC Docket No. 01-92, at 2 (filed July 31, 2017); Comments of Sprint Corporation, WC Docket Nos. 10-90 & 07-135, CC Docket No. 01-92, at 3 (filed July 31, 2017).

Allowing originating carriers to interconnect directly with terminating carriers would have positive effects. First, terminating carriers will lose the ability to inject unnecessary transit or transport costs into termination arrangements. The record contains many examples of terminating carriers establishing points for receipt of traffic that are unnecessarily distant from the called party and collecting mileage-based transport fees to bring the traffic to the end office.²⁶ By requiring the terminating carrier to offer direct interconnection to IXC's or others that wish to bring traffic directly to the network edge, terminating carriers will lose their ability to force others to purchase unnecessary transport.²⁷

Second, this approach will promote competition and fair pricing in the markets for transport and tandem services (including host-remote arrangements). If terminating carriers can require originating carriers and IXC's to use their tandem and transport services (and pay for them), there is little incentive for carriers to develop alternatives and little market pressure on transport rates. But if terminating carriers must allow for direct interconnection, then originating carriers can evaluate the particular route and determine whether it is more efficient to bring traffic to the network edge using direct interconnection, to use the services of another party that has established direct interconnection at that edge, or to use (and pay for) the transport services of the terminating carrier.

²⁶ See, e.g., AT&T Comments at 12 (identifying arbitrage in transport charges for originating 8YY traffic and other “access stimulation schemes”); Comments of Verizon, WC Docket No. 10-90, CC Docket No. 01-92, at 4 (filed Oct. 26, 2017) (noting that “‘mileage pumping’—which occurs when ‘service provider designate distant points of interconnection to inflate the mileage used to compute the transport charges’—remains a widespread and growing practice”) (footnotes omitted).

²⁷ See Letter from Michael R. Romano, Senior Vice President-Industry Affairs & Business Development, NTCA—the Rural Broadband Association et al., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 01-92, WC Docket No. 16-363 (filed Nov. 16, 2017) (letter from multiple carriers and trade associations supporting immediate action to address unnecessary transport charges.).

GCI believes that its proposal works equally well for all types of originating traffic—wireline and CMRS. Telecommunications carriers, including ILECs, CLECs, and CMRS providers, should be responsible to bring traffic to the network edge. At the same time, terminating carriers should be required to offer direct interconnection to carriers willing to bring their traffic to the edge over their own facilities.

2. Section 251(a) provides authority to require interconnection at the network edge.

GCI recognizes that not all terminating carriers are subject to the clear direct interconnection mandates of section 251(c), which applies only to ILECs and may not apply to certain rural ILECs.²⁸ But section 251(c) is not necessary to achieve the result of allowing originating carriers to interconnect at the network edge. Section 251(a) provides sufficient authority for the Commission to require interconnection at the network edge in Alaska.

Under section 251(a), all telecommunications carriers—including ILECs, CLECs, and CMRS providers—are required “to interconnect directly or indirectly with the facilities and equipment of other telecommunications carriers.”²⁹ The Commission has previously read the provision not to require direct interconnection from a carrier that does not wish to offer it; rather, a carrier can meet its Section 251(a) obligations through indirect interconnection.³⁰ Some have

²⁸ 47 U.S.C. § 251(c)(2) (requiring ILECs to “provide, for the facilities and equipment of any requesting telecommunications carrier, interconnection with the local exchange carrier’s network . . .”); § 251(f)(1) (exempting rural ILECs from the requirements of section 251(c) until they receive a bona fide request for interconnection and the state commission determines that the request “is not unduly economically burdensome, is technically feasible, and is consistent with section 254 of this title (other than subsections (b)(7) and (c)(1)(D) thereof”); § 251(f)(2) (allowing any LEC with fewer than 2% of the Nation’s subscriber lines to petition the state commission to suspend or modify requirements of section 251(c)).

²⁹ 47 U.S.C. § 251(a).

³⁰ *See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Interconnection between Local Exchange Carriers and Commercial Mobile Radio*

suggested in this proceeding that the Commission should update its interpretation in light of market developments, or that such a reading of the statute leads to absurd results in that *both* interconnecting carriers must agree to the same mode of interconnection—one carrier cannot connect with the other indirectly while the other connects with the first directly.³¹ GCI does not believe that the Commission needs to resolve this specific issue in order to create a meaningful option for interconnection at the edge for Alaska.

If the Commission declines to require direct interconnection pursuant to Section 251(a), it could require that terminating carriers offer either direct interconnection at the default network edge, or direct or indirect interconnection at the alternative network edge. Whether the carrier offers direct or indirect interconnection, it still bears the costs of transport and termination from the alternative network edge back to the called party. The Commission could require the same result when the terminating carrier determines that direct interconnection at the default network edge is technically infeasible.³² This proposal is similar to the interconnection proposal of AT&T in 2012.³³

This approach would have benefits similar to those of direct interconnection at the default network edge described above. Whether the terminating carrier self-provisions transport from the alternative network edge back to the called party or uses the transport services of a third

Service Providers, First Report and Order, 11 FCC Rcd. 15,499, 15,969 ¶ 997 (1996) (subsequent history omitted).

³¹ See CenturyLink Comments at 12-15; ITTA Comments at 8-10.

³² Interconnection at a remote switch, for example, may not be technically feasible.

³³ See AT&T Framework 2.(b)(i) (“Where interconnection is not technically feasible at the Network Edge, the Terminating Carrier must offer interconnection at an Alternative Edge. . . . Where the Terminating Carrier is exempt from section 251(c), and it does not offer interconnection at the Network Edge or it insists on only indirect interconnection there, the Terminating Carrier must offer direct and indirect interconnection at an Alternative Edge.”).

party, such as an IXC, the terminating carrier bears the cost. The terminating carrier will therefore have incentives to use the most efficient routes possible and to self-provision facilities when the costs of doing so are economically justified.

IV. CONCLUSION

An Alaska-specific approach to establishing the network edge for purposes of bill and keep could bring efficiencies to the unique Alaska market for interexchange services. GCI encourages the Commission to ensure that its approach reflects the realities and differences of Alaska infrastructure to prevent unnecessary confusion and disputes.

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