



November 21, 2019

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 Nos. 10-90 and 16-271

Dear Ms. Dortch:

On November 19, the undersigned from GVNW Consulting, Inc. (GVNW) and Jens Laipenieks, CEO for Arctic Slope Telephone Association Cooperative (ASTAC) conducted separate *ex parte* meetings with Rural Broadband Advisor Preston Wise in Chairman Pai's office, Chief of Staff Joel Miller from Commissioner O'Rielly's office, and with Chief of Staff Travis Litman from Commissioner Rosenworcel's office.

We also conducted an *ex parte* meeting with Bureau staff members Jesse Jachman, Matt Warner, Ben Freeman, Will Holloway and Jiaming Shang.

The *ex parte* meetings included updates from ASTAC on their wireline and wireless Alaska Plan obligations, and middle mile challenges on the North Slope. We reviewed the operational definitional difference between "rural" and "remote." We also shared the improvements that have occurred for the customers in the North Slope region with respect to the broadband customer experience over the last three years.

Maintaining adequate and sufficient federal universal service funding (FUSF) is required for implementation of all of the Commission's universal service initiatives. As required by the Commission's rules, this *ex parte* record is filed in the above referenced dockets. If there are any questions, please call me on 503-612-4409.

Sincerely,

Filed ECFS

Jeffrey H. Smith
President and CEO

Enclosures

Copy to

Preston Wise, FCC
Joel Miller, FCC
Travis Litman, FCC
Jesse Jachman, FCC
Matt Warner, FCC
Ben Freeman, FCC
Will Holloway, FCC
Jiaming Shang, FCC

Completed Fiber Projects

	Length of Fiber (FT & MI)		# of Drops	Timeline	Total Cost
Point Hope	40,000	7.5	162	2016-2017	\$2,110,778
Wainwright	40,000	7.5	192	2016-2017	\$1,514,888
Nuiqsut	35,000	6.6	161	2016-2017	\$1,423,596
Utqiagvik	218,600	41	1,656	2018-2019	\$4,728,645
TOTAL	303,600	62.6	2,171	2016-2019	\$9,777,907

Updated Performance Obligations Wireline

11/19/19 Revision

Note 1		Note 2				Note 3		Note 3	
	Speed to End User	Locations Passed 1/1/15	Locations Passed 1/1/18	Number of Locations At Benchmark 1/1/18	Percent of Locations At Benchmark 1/1/18	Number of Locations At Benchmark Year 5	Percent of Locations At Benchmark Year 5	Number of Locations At Benchmark Year 10	Percent of Locations At Benchmark Year 10
Middle Mile Facility									
Satellite	1Mb/384k	2,509	398	398	100%	398	100%	398	100%
Hybrid Microwave-Fiber	4Mb/1Mb	206							
Hybrid Microwave-Fiber**	10Mb/1Mb		161	161	100%	161	100%	161	100%
Fiber**	10Mb/1Mb		2,156	2,156	100%	2,156	100%	2,156	100%
Fiber**	25Mb/3Mb								
Total		2,715	2,715	2,715		2,715		2,715	

Note 1: Residential speeds. In Fiber and Hybrid fed markets, ASTAC offers a 10/1Mbps best effort service with a \$24.99/Mo access fee and metered usage (\$2 per GB used up to 100 GB, \$1 per GB after 101 GB and up). In the Satellite fed markets, ASTAC offers best effort speeds up to 1Mbps/384kbps service, including unlimited usage. ASTAC will update the Commission when our product offerings improve, triggered by improved economics** on the middle mile service.

Note 2: Residential and estimated business locations passed in ETC's network as of 12/31/15.

Note 3: Year 1 is 2017

** ASTAC's last mile (FTTH) network is capable of delivering higher broadband speeds in all markets than what is offered, but is limited by middle mile network cost/capacity constraints. ASTAC is able to meet the latency requirements in those markets connected by Fiber and Hybrid Microwave-Fiber middle mile. ASTAC has demonstrated why the reasonably comparable rate requirement and delivered speed metrics are not feasible in any of its markets with use of a simple economic model. We can show that the prohibitive factor continues to be the high cost of middle mile transport.



CapEx vs. Support

Year	Plant Funding	USF receipts
2015	\$ 4,862	\$ 4,757
2016	\$ 7,027	\$ 5,247
2017	\$ 13,137	\$ 5,218
2018	\$ 11,901	\$ 5,236
2019 plan	\$ 12,924	\$ 5,236
5 Year Total	\$ 49,851	\$ 25,695