



November 26, 2018

Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554
ATTN: Lisa M. Fowlkes

Re: Wireless Network Resiliency Framework (PS Docket No. 11-60)

To Whom it May Concern:

In response to a letter dated Nov. 6, 2018 from Lisa M. Fowlkes, Bureau Chief, Public Safety and Homeland Security Bureau, Federal Communications Commission (the “FCC” or the “Commission”), to Tina Pidgeon, General Counsel, Chief Compliance Officer, and Senior Vice President, Government Affairs, GCI Communications Corp. (“GCI”) (the “Letter”), GCI submits the following response.

GCI, through its subsidiaries, operates a telecommunications network that covers more of Alaska’s population than any other provider in the State. GCI has developed and deployed that network through a longstanding familiarity with the unique demands of the Alaskan marketplace and environment, its deep resources in Alaska, and its understanding of the needs of Alaskans. As GCI has found, providing service to Alaska is particularly challenging due to “its remoteness, lack of roads, challenges and costs associated with transporting fuel, lack of scalability per community, satellite and backhaul availability, extreme weather conditions, challenging topography, and short construction season.”¹ Therefore, GCI must utilize a variety of technologies in order to provide dependable services, and often must do so in innovative ways in the event of an emergency.

As a member of CTIA, GCI is familiar with the CTIA Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration, and signed on to the Wireless Network Resiliency Framework about one year ago.² In the last two years, GCI has not experienced an emergency in the State of Alaska in which ESF-2 is declared and DIRS is activated. Because the Letter specifically inquires about such events, which GCI did not engage in, GCI does not have the ability to prepare an after-event summary as requested by the Letter. Nevertheless, GCI understands and appreciates the efforts of the FCC to study the preparation of wireless providers to

¹ *Connect America Fund; Universal Service Reform – Mobility Fund; Connect America Fund - Alaska Plan*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139, 10162, ¶ 72 (2016) (“*Alaska Plan R&O*”) (citing *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17829, ¶ 507 (2011)). (“*USF/ICC Transformation Order*”), *aff’d sub nom.* FCC 11-161, 753 F.3d 1015 (10th Cir. 2014)).

² *Letter from Kara Azoocar to Marlene H. Dortch*, Wireless Resiliency Cooperative Framework, PS Dkt. No. 11-60 (Sept. 1, 2017).

restore service in the event of an emergency and aspires here to help the Commission understand GCI's efforts to do so.

GCI takes emergency preparedness seriously. GCI places a high emphasis in its 3-5 month build season on maintenance and support and maintains agreements with several airlines to send crews to remote areas of the State to resolve service disruptions due to ice accumulation, wind damage, or storms, as soon as it is safely possible to do so. GCI has roaming agreements with the four nationwide carriers and has never, to my knowledge, declined a request for mutual aid or roaming in the event of an emergency. Mutual aid is typically provided in the form of backhaul and transport, in which case GCI will work with the requesting provider to provide a path for critical services. For example, GCI provided such support in 2012 in the wake of a windstorm, and in that same year when an undersea fiber cut occurred due to an earthquake. In these instances, GCI restored basic and critical services like phone service and hospital telecommunications services via satellite bypass for other service providers' customers until fiber was restored.

Please direct any questions to the undersigned.

Karl L Cy

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