

December 14, 2017

**Ex Parte**

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

Re: *Connect America Fund – Alaska Plan*, WC Docket No. 16-271

Dear Ms. Dortch:

On December 12, 2017, Chris Nierman of General Communication, Inc, Christine O'Connor of Alaska Telephone Association (“ATA”), and I met with Don Stockdale, Nese Guendelsberger, Dana Shaffer, Garnet Hanly, Jonathan Lechter, Matt Warner, and Matthew Collins of the Wireless Telecommunications Bureau, and Sue McNeil, Alex Minard, Jesse Jachman, Ying Ke, and Alec MacDonnell of the Wireline Competition Bureau.

In the meeting, we reviewed the attached alternative proposal for how Alaska Plan participants could map their fiber and microwave middle mile networks as required by the *Alaska Plan Order*.<sup>1</sup> We explained that the requirements as adopted in the *Middle Mile Mapping Public Notice* require more information, and at a higher level of granularity, than is required to assess the quality of broadband that can be made available to a community.<sup>2</sup> We also reviewed the attached diagram as a simplified illustration of what would be reported pursuant to the alternative proposal.

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<sup>1</sup> *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd. 10,139, 10,158 ¶ 60, 10,172-73 ¶ 102 (2016) (“*Alaska Plan Order*”); see also 47 C.F.R. § 54.316(a)(6).

<sup>2</sup> *Wireline Competition Bureau and Wireless Telecommunications Bureau Release Instructions for Filing Terrestrial Middle Mile Network Maps*, Public Notice, 32 FCC Rcd. 6863 (Wireline Comp. and Wireless Telecomm’n’s Burs. 2017) (“*Middle Mile Mapping Public Notice*”). ATA filed a petition for reconsideration of the *Middle Mile Mapping Public Notice*. Petition for Reconsideration of Alaska Telephone Association, WC Docket No. 16-271 (filed Oct. 10, 2017). No party opposes the petition.

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We look forward to further productive discussions regarding how the Commission can obtain the information it needs while imposing only a reasonable burden on the Alaska Plan participants. Please contact me if you have any questions regarding this matter.

Sincerely,



Julie A. Veach  
*Counsel to General Communication, Inc.*

Attachments

cc:	Don Stockdale	Nese Guendelsberger
	Dana Shaffer	Garnet Hanly
	Jonathan Lechter	Matt Warner
	Matthew Collins	Sue McNeil
	Alex Minard	Jesse Jachman
	Ying Ke	Alec MacDonnell

# **Attachment 1**

## ATA Alternative Mapping Proposal

Goal: Provide the Commission with sufficient information to assess whether changes in available middle mile facilities warrant changes to Alaska Plan commitments and to assess commitments for years 6-10.

Key points:

- The type of broadband connectivity available to a community is defined by the interexchange facilities that serve that community.
- Accuracy and precision need to be sufficient to assess the interexchange facilities available to the community, not the facilities that serve specific locations, except for locations that do not depend on interexchange facilities. Desktop geolocation solutions should be adequate for reporting whether a community is connected by fiber, microwave, or neither.

Alternative Proposal:

*Alaska Plan participants report the following with regard to facilities within their eligible service areas that they own or lease:*

1. Report locations of all fiber (including dark fiber) and microwave **links** (A) connecting local exchanges, and (B) connecting any other sites that are not served directly or indirectly by the links reported in (A).
  - a. For facilities owned by the reporting Alaska Plan participant, link reporting is accurate to within 1,000 meters along the span of the link.
  - b. For facilities leased by the reporting Alaska Plan participant, including IRUs, link reporting is estimated to the best of the participant's ability.
2. Report locations of the **nodes** constituting the beginning and end points of the fiber and microwave links described in #1.
  - a. A node can be an end office or central office, mobile switching center, cable headend, earth station, fixed wireless radio tower, cell tower, fiber terminal, landing station within Alaska territorial waters, point of interconnection, point of presence, peering point, internet gateway, or other terminus point that is directly connected to transport to a node in a different local exchange or to a node outside local exchange boundaries.
  - b. Alaska Plan participants that own the fiber or microwave link associated with a particular node must report the location of the node to within 1,000 meters.
  - c. Alaska Plan participants that lease the fiber or microwave link associated with a particular node must report the location of the node where they interconnect with the link to within 1,000 meters. They should estimate the locations of the other nodes to the best of their ability.

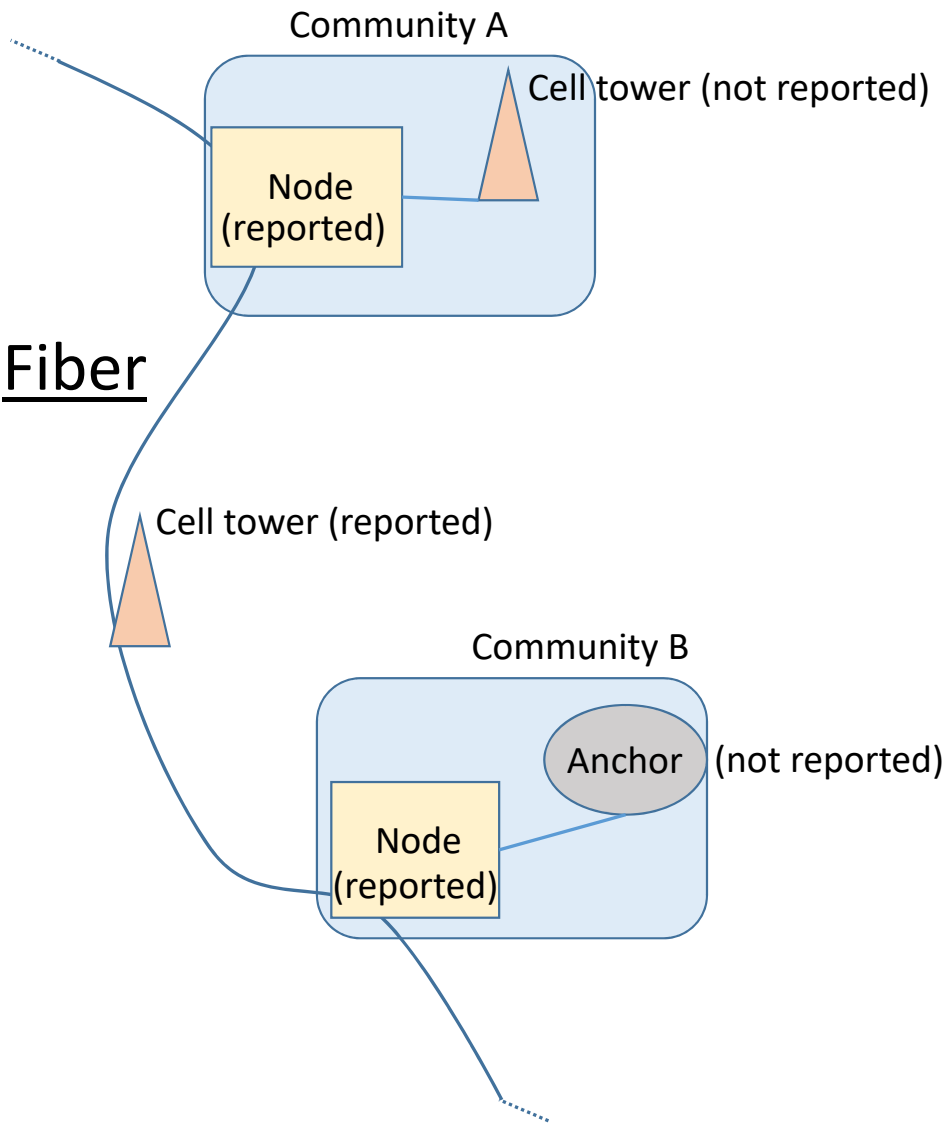
*Timing:*

The length of time that participants will need to gather, format, and report their middle mile data will depend on the final requirements:

- The FCC Form 477 data are due on March 1, 2018. The same staff and consultants who would work on the middle mile data are already committed to handle the Form 477 data.
- Reporting to within 1,000 meters allows the use of desktop tools rather than site visits (unless desktop tools fail to capture a particular location due to cloud cover, outdated photos, etc.). Using desktop tools, however, still requires a person with knowledge of the target site to visually identify each site on the software.
- ATA recommends that the first data collection be due on August 1 or after publication in the Federal Register of announcement of OMB approval under the PRA, whichever comes later.

# **Attachment 2**

Fiber



Microwave

