

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Section 63.71 Application of	)	Comp. Pol. File No. _____
Matanuska Telephone Association, Inc. For	)	
Authority To Discontinue Certain Services	)	
	)	

**SECTION 63.71 APPLICATION**

Pursuant to Sections 63.71 of the Commission's Rules<sup>1</sup> and Section 214(a) of the Communications Act of 1934, as amended,<sup>2</sup> Matanuska Telephone Association, Inc. ("MTA") hereby files this application to discontinue the provision of retail Basic Exchange Telecommunications Radio Service<sup>3</sup> ("BETRS") in its territory in the State of Alaska.<sup>4</sup> In support of this Application, MTA submits the following:

**I. Information Required by Section 63.71(a)(1)-(4).**

**A. Name and Address of Carrier**

Matanuska Telephone Association, Inc.  
1740 S. Chugach Street  
Palmer, Alaska 99645

For purposes of this Application, the Commission may contact:

Shannon M. Heim  
Moss & Barnett  
150 South Fifth Street, Suite 1200

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<sup>1</sup> See 47 C.F.R. § 63.71.

<sup>2</sup> See 47 U.S.C. § 214(a).

<sup>3</sup> Some BETRS customers are served by MTA's discontinued CDMA infrastructure.

<sup>4</sup> As required by Section 63.71(a) of the Commission's Rules, MTA has notified and submitted a copy of this Application concurrent with this filing to the Regulatory Commission of Alaska, the Governor of Alaska and the Secretary of Defense.

Minneapolis, MN 55402  
Telephone: (612) 877-5320  
[Email: Shannon.Heim@lawmoss.com](mailto:Shannon.Heim@lawmoss.com)

**B. Date of Planned Service Discontinuance**

MTA will discontinue BETRS service to all customers in its service territory in Alaska on or about June 1, 2018 or upon completion of all necessary federal and state regulatory approvals. As of the filing of this Application, MTA currently serves only 215 customers on this outdated technology. MTA will assist customers to transition to alternative telecommunications service. Nine customers currently receive Lifeline benefits. MTA is committed to moving those customers to alternate services and/or carriers as appropriate and requested. Three wireless carriers and satellite providers currently provide service in the MTA territory providing competitive choices for customers transitioning their service from the MTA network.

**C. Points of Geographic Areas of Service Affected**

The only customers affected by MTA's discontinuation are retail BETRS customers in the Matanuska Susitna Borough and Denali Borough in Alaska. A map showing the remote terrain is attached as Exhibit D.<sup>5</sup>

**D. Brief Description of the Types of Service Affected**

MTA provides a rural radio service to customers whose location cannot be reached by terrestrial network infrastructure without extraordinary investment. Some customers receive service on a traditional point to point basis and some customers receive BETRS

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<sup>5</sup> There are two locations currently served by BETRS service in the Denali Borough.

service via a CDMA network.<sup>6</sup> BETRS customers only receive rudimentary voice service. The aging BETRS system is beginning to show signs of failure and MTA's CDMA system is being dismantled and MTA must discontinue the service.

## **II. Brief Description of the Dates and Methods of Notice to All Affected Customers.**

Notices will be sent to all existing MTA BETRS customers as a standalone letter once the FCC assigns a docket number. A sample letter is attached as Exhibit A. A reminder message will be included in all bills between December 1, 2017 and May 30, 2018 when MTA expects all customers to be transitioned off the network. Sample bill messages are attached as Exhibit B. An autodialer message will also go out to MTA customers. The text of that message is also included in Exhibit B.

## **III. Status of Carrier.**

MTA is an incumbent local exchange carrier ("ILEC") and Eligible Telecommunications Carrier ("ETC") in Alaska. It is non-dominant with respect to the services to be discontinued. Due to the very limited nature of this discontinuation, MTA does not believe its ETC designation is implicated by this Application. As of filing, MTA has only 9 Lifeline customers. MTA expects those customers to be transitioned to an alternate Lifeline ETC shortly.

## **IV. Circumstance of Discontinuance.**

The FCC established rules in 1988 for the use of BETRS spectrum to provide basic, digital telephone service to subscribers in locations deemed so remote that

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<sup>6</sup> MTA discontinued its wireless service and sold its assets earlier this year. The CDMA license transfer will be completed by mid-2018.

traditional wireline service or service by other means is not feasible. An ILEC may offer BETRS service, but it is not required to do so.<sup>7</sup> MTA installed the BETRS system to serve cooperative members that were too remote to receive service any other way. Over time some BETRS customers were served with CDMA spectrum, but MTA discontinued wireless service in 2017 and is selling the spectrum to another Alaska provider. The equipment used to provide BETRS service has aged so much that it is now obsolete. The equipment is no longer being manufactured so MTA cannot obtain replacement parts.

Mobile service has vastly improved in quality and availability making the BETRS service unnecessary and substandard. MTA recently exited the wireless market and sold the towers holding the BETRS equipment and its CDMA spectrum to another wireless carrier. MTA believes that wireless service is more reliable and a better choice for customers than the now obsolete BETRS service.

Customers may choose to purchase a satellite phone for communications services. Several satellite providers also offer service in the MTA's study area.<sup>8</sup> Satellite phones and data devices can keep Alaskans in contact from remote locations or worksites. Experts recommend that customers use the handheld phone when traveling in remote areas and use a fixed phone for remote offices or dwellings. No customer will be without an alternative service option.

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<sup>7</sup> See 47 C.F.R. § 22.702 ("Existing and proposed communications common carriers are eligible to hold authorizations to operate conventional central office, interoffice and rural stations in the Rural Radiotelephone Service.").

<sup>8</sup> For example, Microcom offers satellite service from several providers.  
<http://microcom.tv/satellite-phone>.

**V. Certification**

The certification of Chief Operations Officer Wanda J. Tankersley is attached as Exhibit C. Ms. Tankersley certifies that the statements contained herein are true, complete and correct to the best of her knowledge. All assertions contained herein are made in good faith.

**VI. Conclusion**

Discontinuation of MTA's BETRS service fulfills the public interest. Continuing an out of date technology is not warranted given the viable service alternatives available to remote customers currently purchasing BETRS service. Wireless and satellite carriers offer more robust service on a more dynamic platform. No existing customer of MTA will go without service options. Therefore, MTA respectfully requests the Commission grant this Application.

Respectfully submitted on this 15<sup>th</sup> day, December 2017.

MOSS & BARNETT

Attorneys for Matanuska  
Telephone Association, Inc.

By: /s/ Shannon M. Heim  
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150 South Fifth Street  
Minneapolis, MN 55402  
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## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Section 63.71 Application was served this 15<sup>th</sup> day of December, 2017, by electronic service or by mailing true and correct copies thereof, postage prepaid, to the following persons at the addresses listed below.

Chairman Steven McAlpine  
Regulatory Commission of Alaska  
701 West Eighth Avenue, Suite 300  
Anchorage, Alaska 99501-3469

Office of Governor William Walker  
State of Alaska  
P.O. Box 110001  
Juneau, AK 99811-0001

Secretary of Defense  
Attn: Special Assistant for Telecommunications  
1000 Defense Pentagon  
Washington, D.C. 20301

/s/ Shannon M. Heim  
Shannon M. Heim

**Exhibit A**  
**Notification Letter**



December 28, 2017

## IMPORTANT NOTICE REGARDING DISCONTINUANCE OF MATANUSKA TELEPHONE ASSOCIATION'S FIXED WIRELESS SERVICES

Dear (mail merger name),

We are reaching out to provide advance notice that our fixed wireless service, formally known as retail Basic Exchange Telecommunications Radio Service (BETRS), will be permanently turned down on June 1, 2018. At that time, we will no longer provide MTA phone service through the fixed wireless service. This will affect all MTA BETRS customers (roughly 0.74% of MTA's total customer base) throughout our service area, specifically those customers residing in the Matanuska Susitna Borough and Denali Borough. You can keep your fixed wireless equipment and there will be no charge to you.

Why are we making this change?

The FCC established rules in 1988 for the use of BETRS spectrum (used in fixed wireless) to provide basic, digital, telephone service to subscribers in locations deemed so remote that traditional wireline service or service by other means was not feasible. However, the communications industry has been rapidly evolving and the quality of available cellular/wireless service exceeds your existing fixed wireless service.

Earlier this year, MTA exited the wireless market and sold its assets. Consequently, MTA cannot maintain the fixed wireless service in the future and must inform customers currently purchasing the service that an alternative service provider is now required. We've included a list of alternative options for your reference as you begin to select the service provider that will best meet your needs.

We are proud to have provided BETRS service for more than three decades. As a valued customer, we are offering you a one-time payment of \$400.00 if you transfer your MTA phone service by February 28, 2018.

MTA has notified the Federal Communications Commission (FCC) of its proposed discontinuance of service (See DA-17-XXXX). The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Matanuska Telephone Association. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

If you have questions concerning this notice, please contact MTA at 907-745-3211 from the Mat-Su area, or toll free at 800-478-3211 (within Alaska) Monday – Friday from 8:00 a.m. to 6:00 p.m. or Saturday from 10:00 a.m. to 4:00 p.m.

Sincerely,  
MTA Customer Service

1740 S. Chugach St.  
Palmer, AK 99645  
[mtasolutions.com](http://mtasolutions.com)



# POTENTIAL ALTERNATIVE SOLUTIONS FOR MTA FIXED WIRELESS CUSTOMERS

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## AT&T

AT&T is available in some of the remote areas. Bald Mountain, Byers Creek, Honolulu, check with AT&T for service in the area.

### *Equipment needed for purchase:*

- UMTS Wireless router. AT&T bundle pricing available. Ask for wireless home phone solution.

### *Service agreement needed:*

- Inquire with AT&T for plan pricing.

### *Contact:*

- AT&T: 888-333-6651
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## HUGHES NET (Satellite Service)

Hughes Net is available nearly anywhere in the Mat-Su Borough. Tree cover can be an issue.

### *Equipment needed for purchase or lease:*

- Small satellite dish, radio or VoIP phone.
- Dish cost is \$700 (.98 Meter Dish). Dish and radio must be installed and commissioned by tech. Fly out expense and labor hours will incur. Inquire with Alaska Satellite for costs.

### *Service agreement needed:*

Hughes net plans start around \$50 per month, up to \$100 month.

### *Contact:*

- Alaska Satellite: 1-888-396-5623. Ask about current offering. VoIP service and Internet over satellites.
  - Microcom: 907-376-0444
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## EXEDE (Satellite Service)

Exede is available in most areas. Tree cover can be an issue.

### *Equipment needed:*

- Equipment available by lease only. Lease program of \$10 per month to \$300 for lifetime customers.

### *Service agreement needed:*

- Multiple plans available.
- Vacation suspension plan available.

### *Contact:*

- Alaska Satellite: 1-888-396-5623
  - Microcom: 907-376-0444
- 

## GCI

GCI is available in some areas with plans to place equipment at Shell and Bald Mountains.

### *Contact:*

- GCI: 800-800-4800
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## VERIZON 4G LTE

Verizon 4G LTE is available for customers that currently receive their fixed wireless from Bald Mountain, Talkeetna, Shell Mountain, Byers Creek, Honolulu, Caswell, Willow, Deshka and Sutton cell sites. This is not a viable solution for customers living in the Alexander Creek area.

### *Equipment needed:*

- Proxicast High Gain 11dbi Yagi Antenna 3g, 4g, Lte/xLte/Wi-Fi (\$59.95 Prime from Amazon)
- Proutone 65db LTE 700mhz Verizon Signal Booster kit with directional panel antenna, cabling and \$119.99 Prime from Amazon.
- Verizon smartphone Internet

- Verizon MiFi Jetpack, available from Amazon or Verizon for \$50-\$200. This equipment can be self-installed.
- Additional option – Frigid North in Anchorage (907-561-4633) carries Wilson cell signal boosters and accessories. Verizon Band 13 700mhz. booster/repeater and the antenna in that same frequency band.

### *Service agreement needed:*

- Verizon phone and/or data plan.

### *Contact:*

- Verizon: 907-519-0344

## **Exhibit B**

### **Language to be added to bills as of December 1, 2017:**

MTA will discontinue BETRS service effective June 1, 2018. MTA gave notice to the Regulatory Commission of Alaska and the Federal Communications Commission. You may offer comment to the FCC at: <https://www.fcc.gov/ecfs/> (Docket Comp. Pol. File No. \_\_\_\_\_).

### **Audodialer Message**

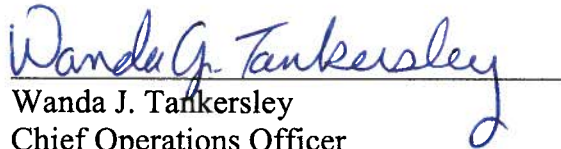
This is an important message from MTA regarding your Lifeline discount. MTA will terminate BETRS service in the near future and local phone service will no longer be offered. Please call 745-3211 today to learn about service options that are available for you. Thank you for being a valued MTA customer and we look forward to hearing from you.

**Exhibit C**

**CERTIFICATION OF WANDA J. TANKERSLEY**

I, Wanda, J. Tankersley, certify that the statements contained herein are true, complete and correct to the best of my knowledge. All assertions contained herein are made in good faith.

Dated: December 15, 2017

  
Wanda J. Tankersley  
Chief Operations Officer  
Matanuska Telephone Association, Inc.