



December 3, 2014

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 No. 10-90; PS Docket No. 14-193; GN Docket No. 13-5

Dear Ms. Dortch:

On December 1, Steve Merriam and Jens Laipeniaks from Arctic Slope Telephone (ASTAC) and the undersigned from GVNW Consulting, Inc. (GVNW) conducted separate ex parte meetings with Amy Bender from Commissioner O’Rielly’s office and Nick Degani from Commissioner Pai’s office. On December 3, we conducted a similar ex parte session with Rebekah Goodheart from Commissioner Clyburn’s office. Mr. Smith participated in the December 3 session telephonically.

These separate ex parte meetings covered five issues:

First, we discussed the year end 2014 status of the steps that ASTAC is engaged in to increase capacity and avail their customers of robust connections, in light of the immense size of their service area and the challenges that accompany serving areas of uncompromising terrain.

Second, we discussed our support for the NTCA approach to proposed support reductions that reflect a balance between a flat percentage reduction and a per-line adjustment. We respectfully submit that it is vital that the Commission monitor, based on empirical evidence, the impact on rural carrier customers of these proposed reductions in support if enacted.

Third, Steve Merriam provided a brief update on the status of the process underway in the state of Alaska to develop a consensus around an Alaska plan for prospective federal universal service support.

Fourth, in the meetings with Mr. Degani and Ms. Bender, we briefly discussed the statements offered by Commissioners Pai and O’Rielly, respectively, in the 911 docket [FCC 14-186] and technology transition [FCC 14-185] dockets.

Fifth, in the meeting with Ms. Goodheart, Mr. Merriam expressed his appreciation for the Commission’s willingness to modify the initial definition of urban cluster as used in the e-rate arena. Mr. Smith and Mr. Merriam both expressed concerns about how the increases in e-rate

funding could impact the areas of universal service support that provide the foundational infrastructure architecture that the entire communications system is dependent on.

As required by the Commission's rules, this ex parte record is now filed in the above referenced dockets. If there are any questions, please call me on 503.612.4409.

Respectfully submitted,

Via ECFS 12/3/14

Jeffrey H. Smith
President and CEO

Copy to
Amy Bender, FCC
Nick Degani, FCC
Rebekah Goodheart, FCC

Steve Merriam, ASTAC
Jens Laipenieks, ASTAC

Dave Dengel, Copper Valley
Mike Romano, NTCA
Christine O'Connor, ATA