

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

In the Matter of )  
 )  
Connect America Fund ) WC Docket No. 10-90  
 )

**COMMENTS OF THE ALASKA TELEPHONE ASSOCIATION  
ON PROPOSED METHODOLOGY FOR CONNECT AMERICA  
HIGH-COST UNIVERSAL SERVICE SUPPORT RECIPIENTS  
TO MEASURE AND REPORT SPEED AND LATENCY  
PERFORMANCE TO FIXED LOCATIONS**

The Alaska Telephone Association (“ATA”) files Comments in this proceeding pursuant to the Commission’s Public Notice DA 14-1499 released October 16, 2014 which seeks comment on how compliance with performance metrics should be determined for recipients of high-cost support which deploy broadband networks to serve fixed locations.

In the Public Notice the Commission proposes to measure speed and latency between the customer premises and a Commission-designated Internet core peering interconnection point (IXP)<sup>1</sup>. This approach concerns ATA’s member companies whose nearest IXP is in Washington State and must be accessed at a minimum via undersea cable, and for many companies also via hybrid microwave-fiber terrestrial system, and/or satellite. It does not recognize the unique challenges of Alaska’s geography and infrastructure and would impose unattainable performance metrics on many Alaskan carriers.

The Commission has already recognized the cost and performance limitations of satellite backhaul by reducing the speeds required under broadband public interest obligations<sup>2</sup>. The Commission again recognized Alaska’s unique challenges in the Report and Order which adopted a methodology for calculating reasonable comparability benchmarks<sup>3</sup>. In that Order the Commission waived implementation of the broadband reasonable comparability benchmarks for Alaska carriers for 2015. The waiver gives valuable time to consider and develop a methodology which will accurately capture the unique circumstances of Alaskan carriers and result in fair and reasonably attainable benchmarks.

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<sup>1</sup> *Public Notice* at 3 and 9.

<sup>2</sup> *Transformation Order* at para. 101.

<sup>3</sup> *Report and Order* DA 14-169, released October 29, 2014.

The same challenges of geography and infrastructure which necessitated a waiver of the broadband reasonable comparability benchmarks are present when considering performance metrics<sup>4</sup>. Latency is drastically compromised via satellite transport. For example, Arctic Slope Telephone Association Cooperative provides broadband service to multiple locations via satellite and experiences 500-600 millisecond latency, far above the 100 millisecond threshold referenced in regard to real-time applications such as VoIP<sup>5</sup>.

We respectfully request that the Commission waive application of the speed and latency metrics described in the Public Notice and instead consider these issues in a future Public Notice when the methodology for reasonable comparability benchmarks is being examined<sup>6</sup>. Measuring performance between a customer premise in Alaska and an IXP in the contiguous states and applying performance metrics identical to those required of a company located on or very near the Internet backbone is not a reasonable test of Alaskan carriers' service. Applying performance metrics as proposed in the Public Notice would result in many Alaskan carriers being unable to certify to meeting the metrics and could result in withholding crucial universal service support.

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<sup>4</sup> See Martin & Baugh Consulting Group, *Satellite Internet Review* (Jan. 30, 2012), attachment to Shannon M. Heim, Ex Parte Notice, before the FCC (June 12, 2012); see also *Comments of the Regulatory Commission of Alaska, Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rate for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, before the FCC (April 18, 2011) ("*RCA Comments*") at 22 ("Alaska providers have commented that satellite transmission has problems with latency, data transmission continuity, and disruptions from weather conditions... Nevertheless, for many areas of Alaska, satellite links may be the only viable option to deploy broadband, provided sufficient capacity is available.").

<sup>5</sup> *Transformation Order* at ¶196.

<sup>6</sup> See Report and Order DA 14-1569 at ¶12.

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ATA appreciates the Commission's recognition of our challenges in the waiver granted in the reasonable comparability benchmark Order. We ask that the Commission take the same approach here and grant a waiver of the performance metrics which will allow Alaskan companies to continue to operate and upgrade their networks without fear of disruption to essential universal service support while appropriate metrics are developed.

Respectfully submitted,

*Via ECFS 12/19/2014*

Christine O'Connor  
Executive Director  
Alaska Telephone Association  
oconnor@alaskatel.org

cc: Senator Lisa Murkowski  
Senator Dan Sullivan  
Representative Don Young  
Chairman Robert Pickett, Regulatory Commission of Alaska