

January 20, 2015

Ex Parte

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

Re: *Connect America Fund*, WC Docket No. 10-90; *High-Cost Universal Service Support*, WC Docket No. 05-337

Dear Ms. Dortch:

On January 15, 2014, Christopher Nierman of General Communication, Inc. (“GCI”) and I, on behalf of GCI, met with Carol Matthey, Alexander Minard, Katie King, Ian Forbes and Heidi Lankau, all of the Wireless Competition Bureau.

We discussed the Commission’s recent Order addressing CAF II model-based and frozen support, and inquired as to how the provisions relating to census blocks subject to competitive bidding as discussed with respect to model-based support applied to non-contiguous areas subject to frozen support. We reiterated our concerns with ACS’ proposal to exclude all areas not on the Alaska Highway system, irrespective of backhaul technologies. We also reiterated our objections to ACS’ proposal to get “credit” for service to schools and rural health clinics, both of which are supported through separate, competitively bid support mechanisms. ACS’ proposal would skew the bidding in those cases by subsidizing one provider over others, and it is also ambiguous as to whether it is seeking to use service to community anchor institutions in areas not eligible for use of support to reduce the obligations to build out to areas that are eligible for use of support.

Please contact me if you have any questions.

Sincerely,



John T. Nakahata
Counsel to General Communication, Inc.

cc: Carol Matthey
Alexander Minard
Katie King
Ian Forbes
Heidi Lankau