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February 10, 2015

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

Re: **Notice of Ex Parte – WC Docket No. 10-90 and WT Docket No. 10-208**
Adak Eagle Enterprises and Windy City Cellular

Dear Ms. Dortch:

On Monday, February 9, Larry Mayes, Chief Executive Officer of Adak Eagle Enterprises, LLC ("AEE"), which includes Adak Telephone Utility and Windy City Cellular, LLC ("the companies"), and Andilea Weaver, the companies' Chief Operating Officer, along with Monica Desai, counsel to the companies, met by telephone with Suzanne Yelen (Assistant Division Chief, Industry Analysis and Technology Division, Wireline Competition Bureau), Michael Janson (Front Office Legal Advisor, Wireless Telecommunications Bureau), and Joseph Sorresso (Telecommunications Analyst, Wireline Competition Bureau) of the Federal Communications Commission (FCC). The purpose of the meeting was to discuss elements of a long term resolution in connection with the companies' pending Application for Review[1] and Petition for Reconsideration.[2]

The companies emphasized that because the term of their loan from the Department of Agriculture Rural Utilities Service (RUS) is thirty years, it would be important to provide relief that would take into consideration the long term nature of the loan and associated RUS payments.

The companies also noted that line counts are subject to fluctuation, with numbers increasing during the fishing season when Icicle Fisheries is in operation, and dipping when the fish plant is closed. The companies also emphasized that their line counts are on a

[1] Adak Eagle Enterprises, LLC & Windy City Cellular, LLC, Application for Review, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Aug. 14, 2013).

[2] Adak Eagle Enterprises, LLC & Windy City Cellular, LLC, Petition for Reconsideration, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Aug. 14, 2013).

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declining trend, with more people increasingly abandoning their wireline phones altogether, and switching to wireless exclusively.

In addition, the companies asked the FCC to take into account the potentially uncertain nature of future Connect America Fund funding, as well as Interstate Common Line Support mechanisms, which are under review and subject to change.[3]

The companies also noted that State requirements as well as Universal Service Administrative Company requirements impact the amounts it can collect from customers.

Because of these various types of uncertainties, as well as the many uncertainties associated with living in such a volatile and unpredictable climate, the companies requested that any relief that is set by the Commission that is based on the current balance of revenues and expenses should also take into account the unstable nature of those revenues and expenses. The companies requested that staff consider an adjustment mechanism that would prevent the companies from having to request further relief from the Commission sooner than any expiration term. Alternatively, the companies asked for a commitment by the Commission to implement swift relief should revenues decrease or expenses increase due to unforeseen circumstances.

Finally, the companies thanked the staff for their hard work over the course of the past three years in working with the companies to find a solution that would allow for sustained communications for the residents of Adak Island, Alaska.

Respectfully submitted,

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Counsel to Adak Eagle Enterprises, LLC and Windy City Cellular, LLC

cc:
Suzanne Yelen
Michael Janson
Joseph Sorresso

[3] *See, e.g., Connect America Fund et al.,* WC Docket No. 10-90 et al., Report and Order, FCC 14-190 (Dec. 11, 2014); *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al., 29 FCC Rcd 7051 (Apr. 23, 2014).