
Alaska Telephone Association

Michael Garrett
President

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Christine O'Connor
Executive Director

February 20, 2015

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 02554

RE: Ex parte filing in WC Docket No. 10-90

Dear Ms. Dortch:

On February 18 I joined a group representing Alaskan telecommunication providers including Steve Merriam from Arctic Slope Telephone Association Cooperative, Dave Dengel and Tabitha Gregory from Copper Valley Telecom, Dave Goggins from TelAlaska, Chris Nierman from GCI, John Nakahata Counsel for GCI, and Jeff Smith from GVNW Consulting in an ex parte meeting with the following members of the Wireline Competition Bureau staff: Carol Matthey, Ryan Palmer, Alex Minard, Chris Cook, and Mark Walker; and the following members of the Wireless Telecommunications Bureau: Jim Schlichting, Elliott Maenner, Audra Hale-Maddox, and Margaret Wiener. Ted Burmeister and Suzanne Yellen from the WCB attended telephonically.

At the meeting I presented the attached Alaska Plan which contains recommendations for future universal service support for Alaska's rate of return and competitive providers. I described the development of the Plan which was drafted in response to questions posed by Chairman Wheeler during his visit to Alaska in August, 2014. I reviewed the process used to reach consensus on the Plan and noted the agreement of all rate of return and competitive carriers in Alaska. We discussed the Plan's recommended levels of support, related performance obligations, and accountability mechanisms.

As required by Commission rules, this ex parte letter is being filed in WC Docket 10-90.

Respectfully submitted,

Via ECFS 2/20/2015

Christine O'Connor
Executive Director

cc:

Carol Matthey
Ryan Palmer
Alex Minard
Chris Cook
Mark Walker
Ted Burmeister

Suzanne Yellen
Jim Schlichting
Elliott Maenner
Audra Hale-Maddox
Margaret Wiener

Dave Dengel
Tabitha Gregory
Dave Goggins
Steve Merriam
Jeff Smith

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CONSENSUS ALASKA PLAN

Alaska Telephone Association member companies serve some of the most challenging and remote areas of the country¹. We have demonstrated capability to deliver crucial connections to our communities. We must have stable universal service support to maintain, extend and upgrade existing broadband infrastructure and construct broadband networks in unserved or underserved markets in Alaska.

ATA proposes universal service fund support be stabilized by implementing a 10-year freeze for Alaskan carriers. The freeze implemented for wireless carriers in 2012 has been successful in maintaining and extending wireless service to unserved areas. The freeze offered to Alaska Communications will enable service to be maintained, upgraded and extended. A similar freeze for Alaska's ILECs will allow the same positive result of upgraded broadband service and newly served Alaskans.

WIRELINER

Freeze Support for Alaska ILECs

We propose Alaskan ILECs receive frozen support for a 10-year period. Frozen funding will create stability which will assure continued service in remote Alaska and allow deployment to underserved and unserved areas.

Support for each carrier will be frozen at final 2011 levels for high cost loop support (HCLS) and interstate common loop support (ICLS).

Performance Obligation

Carriers receiving frozen support will meet specific performance obligations during the 10-year period. Each Alaskan ILEC will work with the Bureau to define performance requirements sufficient to demonstrate that support is being used to advance voice and broadband service in Alaska. Performance obligations will reflect operations, upgrades and new deployment enabled by frozen support. Carriers will customize their commitments according to their individual situations regarding access to middle mile, location, and other factors which affect cost and service levels. The price cap carrier's performance obligations will be determined in the CAF II proceeding currently underway. We support flexibility in determining both rate of return and price cap carrier obligations, recognizing the unique challenges and conditions in Alaska.

Frozen support will be used for both network-wide operating expenses and capital expenses. Support will be used for data-only broadband lines as well as those used for voice.

¹ ATA member companies include: Adak Telephone Utility, Alaska Communications, Alaska Telephone Company, Arctic Slope Telephone Association Cooperative, Bristol Bay Telephone Cooperative, Bush-Tell, Copper Valley Telecom, Cordova Telephone Cooperative, GCI Communications Corp., Interior Telephone/Mukluk Telephone dba TelAlaska, City of Ketchikan, dba Ketchikan Public Utilities, Matanuska Telephone Association, Nushagak Cooperative, OTZ Telephone Cooperative, Summit Telephone Company, United Utilities, and Yukon Telephone Company.

Carriers will continue to submit all required ETC reports and meet existing reporting and compliance obligations.

The Commission will re-evaluate broadband deployment and universal service funding in Alaska in 2025 to consider extending the frozen support period or implementing an alternative support mechanism for wireline service.

WIRELESS

Freeze Wireless Support for All Alaska Wireless Carriers.

Stable Support

We support the FCC's proposal to freeze wireless CETC support as of December 31, 2014 for carriers serving Remote Alaska², and propose that funding be frozen for a period of 10 years. Frozen funding will sustain the stability which has been provided under the initial CETC freeze, assure continued wireless service in remote Alaska, and allow deployment to areas which have no wireless service today.

We propose all Remote Alaska CETC support be frozen on a company basis at final 2014 levels for a period of 10 years³. All Remote Alaska CETC wireline support will immediately be used only for mobile voice and broadband service. As non-Remote Alaska CETC funding phases down, that support will be re-targeted to Remote areas without any wireless service via an FCC reverse auction of up to \$27 million per year—the current amount of annual non-Remote Alaska CETC support.

Alaska CETCs will receive frozen support in lieu of Mobility Fund Phase II and Tribal Mobility Fund Phase II funds.

Performance Obligation

Wireless carriers receiving frozen support will use that support to provide mobile voice and broadband services in areas not receiving 4G LTE service directly from AT&T or Verizon as of 12/31/2014. Areas served by rural partners of Verizon or AT&T who are providing service using the rural company's infrastructure will not be considered served by AT&T or Verizon.

Each Remote Alaska CETC will work with the Bureau to define specific performance requirements sufficient to demonstrate that support is being used to provide mobile voice and broadband services in areas that are not receiving 4G LTE service from AT&T or Verizon as of December 31, 2014.

Carriers will continue to submit all applicable ETC and Mobility Fund reports and meet existing reporting and compliance obligations, including submittal of 5-year plans.

² See *Connect America Fund, et al.*, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 14-54, WC Docket No. 10-90, et al., ¶ 250 (rel. June 10, 2014).

³ This provision will not apply to AT&T Mobility aka Dobson Cellular Systems CETC phase-down trajectory which will continue as set in previous Commission Orders.

Transition to Mobility Support Mechanism

At the conclusion of the transition period, the Commission will determine the most appropriate successor mechanism for Alaska areas not receiving LTE service from AT&T or Verizon.

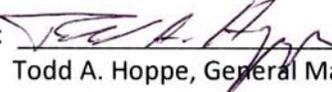
SUMMARY

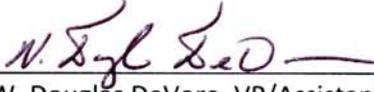
Implementing frozen support for a term of 10 years will grant necessary stability to allow Alaska's carriers to continue extending advanced telecommunications services to Alaskans. Stable, predictable support is essential to enable our carriers to operate, extend and upgrade existing broadband networks and operate and deploy wireless service in remote Alaska.

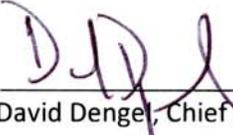
Signed:  Date: 1/28/15
Andilea Weaver, Chief Operations Officer
Adak Eagle Enterprises

Signed:  Date: 1/28/15
Michael Garrett, Chief Operating Officer
Alaska Telephone Company
Bettles Telephone, Inc.
North Country Telephone, Inc.

Signed:  Date: 2/3/2015
Stephen Merriam, Chief Executive Officer
Arctic Slope Telephone Association Cooperative

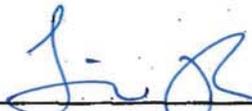
Signed:  Date: 1/28/2015
Todd A. Hoppe, General Manager
Bristol Bay Telephone Cooperative

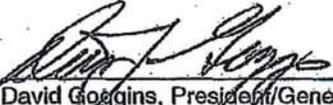
Signed:  Date: 01-28-2015
W. Douglas DeVore, VP/Assistant General Manager
Bush-Tell, Inc.

Signed:  Date: _____
David Dengel, Chief Executive Officer
Copper Valley Telephone Cooperative

Signed:  Date: 1-28-15
Paul Kelly, Chief Executive Officer/General Manager
Cordova Telephone Cooperative

Alaska Telephone Association
Consensus Alaska Plan

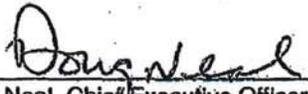
Signed:  Date: 1/28/15
Tina Pidgeon, General Counsel, Chief Compliance Officer, and Senior Vice President,
Governmental Affairs
General Communication, Inc.

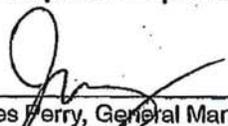
Signed:  Date: 1-28-15
David Goggins, President/General Manager
Interior Telephone
Mukluk Telephone

Signed:  Date: 1-28-2015
Ed Cushing, Division Manager
City of Ketchikan, dba Ketchikan Public Utilities

Signed:  Date: 1/28/15
Wanda Tankersley, Chief Financial Officer
Matanuska Telephone Association

Signed:  Date: 1-28-2015
Mike Megli, Chief Executive Officer
Nushagak Cooperative

Signed:  Date: 1/28/15
Doug Neal, Chief Executive Officer
OTZ Telephone Cooperative

Signed:  Date: 1/28/15
James Perry, General Manager
Summit Telephone Company, Inc.

Signed: Craig Mollerstuen Date: 1/28/15
Craig Mollerstuen, Vice President
United Utilities, Inc., A GCI Company

Signed: Don Eller Date: 1/28/15
Donald Eller, General Manager
Yukon Telephone Company, Inc.