



March 4, 2015

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VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies, WT Docket No. 13-238; Acceleration of Broadband Deployment: Expanding the Reach and Reducing the Cost of Broadband Deployment by Improving Policies Regarding Public Rights of Way and Wireless Facilities Siting, WC Docket No. 11-59*

Dear Ms. Dortch:

Earlier today, the undersigned had a telephone conversation with Deena Shetler of the Wireline Competition Bureau to discuss some of the challenges General Communication, Inc. (GCI) encounters when attempting to deploy communications infrastructure on federal property. Specifically, I argued that streamlining federal permitting requirements could facilitate additional investment in broadband and other communications infrastructure by reducing costs and delay, while maintaining a fair, fact-based review process.

The federal government manages almost 60 percent of the total land in Alaska, a state where the distances between communities can be vast. Particularly for middle-mile projects, GCI must obtain prior authorization from multiple federal agencies before it is permitted to deploy new communications infrastructure. Unfortunately, far too often, the U.S. federal government's restrictions on land use and its stringent permitting requirements raise GCI's costs sufficiently that it undermines the business case and prevents GCI from deploying infrastructure it otherwise would bring to market. These restrictions operate as a significant barrier to investment and slow or prevent the delivery of new and improved communications services to Alaskan residents and businesses, including Alaska Native populations.

Consistent with prior recommendations of federal inter-agency working groups,¹ I urged that interagency coordination be institutionalized so that a single agency be selected to

¹ See, e.g., Steering Committee on Federal Infrastructure Permitting and Review Process Improvement, *Implementation Plan for the Presidential Memorandum on Modernizing Infrastructure Permitting*

consolidate and coordinate all the permitting required for a specific project very soon after an application is filed. Reducing the time for selection of a lead agency, and quickly creating a project-specific interagency team with an agreed-upon timeline that includes key milestones for all federal permits and reviews could significantly streamline federal permitting of certain projects. In addition, expanding the number of activities deemed normally not to have significant adverse impacts to the environment and thus treating such activities as exempt from the detailed analysis called for by the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) and possibly other environmental regulations could further significantly streamline federal permitting requirements in certain situations.

We look forward to continuing to work with the Commission to reduce the barriers federal permitting processes pose for broadband deployment.

Sincerely,



Tim Stelzig

cc: Deena Shetler

(May 2014), at <http://www.permits.performance.gov/pm-implementation-plan-2014.pdf>; see also Council on Environmental Quality, Executive Office of the President, and Advisory Council on Historic Preservation, *NEPA and NHPA - A Handbook for Integrating NEPA and Section 106* (Mar. 2013), at http://www.whitehouse.gov/sites/default/files/nepa_and_nhpa_handbook.pdf.