

September 18, 2015

VIA ELECTRONIC FILING

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

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On Wednesday, September 16, 2015, Alaska Communications (“ACS”) representatives Leonard Steinberg, Ruth Willard, Mike Todd, and Randy Ritter, together with Richard Cameron (consultant) and I, had a telephone conference with Alex Minard and Rebekah Douglas of the Commission’s Wireline Competition Bureau. The purpose of the call was to discuss open matters in the above-captioned docket specifically affecting implementation of Phase II of the Connect America Fund (“CAF”) in Alaska. Pursuant to Section 1.1206(b) of the Commission’s rules, this is a summary of ACS’s advocacy on this call.

ACS reiterated the terms it proposed on February 3, 2015, for accepting frozen CAF Phase II support for a ten-year term and completing broadband deployment to specified locations with certain flexibility as articulated in ACS’s proposal.¹ ACS urged the adoption of a final order approving these terms as soon as possible, and observed that the Commission has delegated broad authority to the Bureau to specify final terms of CAF Phase II implementation.

ACS needs to understand the final CAF Phase II terms for Alaska by the end of October 2015 to be able to include any resources for CAF-based broadband deployment in its 2016 budget. If ACS receives CAF Phase II parameters after the end of October, resources will already be committed for other projects and the likelihood of completing any new broadband planning or deployment in calendar year 2016 will be materially diminished.

ACS presently is preparing its 2016 corporate budget, and expects that process to be substantially completed by October 31. ACS needs to understand the scope of the CAF Phase II obligations, and allocate resources now, for any Phase II planning, engineering, or construction to take place in 2016 (assuming ACS accepts those obligations). ACS anticipates that its overall

¹ See Letter to Marlene H. Dortch, Secretary, from Karen Brinkmann, Counsel to ACS, in WC Docket No. 10-90 (filed Feb. 3, 2015).

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CAF Phase II planning will require up to two years to complete, with six to eight months' lead time required before even the most accessible locations can be built out. Alaska has an unusually short construction season, typically starting in May and ending in September, depending on weather conditions. Moreover, in Alaska there is a limited workforce capable of executing the necessary facilities installation. Contracts must be executed and permits and materials secured early in 2016 if broadband deployment is to take place next summer. In short, any resources not budgeted for in 2015 will not be available for CAF Phase II in 2016.

ACS looks forward to furthering the Commission's broadband deployment goals, and beginning to enable 10/1 Mbps broadband access to unserved Alaskans in 2016, but requires a decision from the Bureau or the Commission in order to do so. ACS therefore urges the adoption of a final plan for CAF Phase II implementation in Alaska, in accordance with ACS's February 3 proposal, by October 31, 2015.

Please direct any questions concerning this filing to me.

Very truly yours,



Karen Brinkmann

Counsel for Alaska Communications

cc: Carol Matthey
Alex Minard
Rebekah Douglas