

December 15, 2015

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VIA ELECTRONIC FILING

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

DEC 15 2015

Federal Communications Commission
Office of the Secretary

Re: Connect America Fund, et al. -- WC Docket Nos. 10-90, 05-337

Dear Ms. Dortch:

Alaska Communications Services Group, Inc. ("Alaska Communications") hereby responds to the recent submission in the above-captioned docket by the Alaska Telecommunications Association ("ATA") concerning the proposal it calls the "Consensus Alaska Plan"¹ (the "ATA Plan").

As set forth in Alaska Communications' prior filings in this proceeding, while Alaska Communications supports elements of the ATA Plan, it does not support the entire plan. Notably, the ATA Plan does not address the need for adequate and affordable terrestrial middle mile service necessary to achieve the goals of comprehensive universal service reform. Alaska Communications has submitted a proposal, "Closing the Middle Mile Gap In Alaska: A Proposed Plan of Action for All of Alaska,"² that it believes permits the Commission to fulfill its

¹ Letter from Christine O'Connor, ATA Executive Director, to Marlene Dortch, FCC Secretary, WC Docket No. 10-90 (filed Nov. 19, 2015) ("ATA November 19 Letter").

² See Letter from Karen Brinkmann, Counsel to Alaska Communications, to Marlene H. Dortch, FCC Secretary, WC Docket No. 10-90 (filed Nov. 19, 2015). See also Letter from Karen Brinkmann, Counsel to Alaska Communications, to Marlene H. Dortch, FCC Secretary, WC Docket No. 10-90 (filed May 14, 2015); Letter from Karen Brinkmann, Counsel to Alaska Communications, to Marlene H. Dortch, FCC Secretary, WC Docket No. 10-90 (filed Feb. 27, 2015); Letter from Anand Vadapalli, CEO, Alaska Communications, to FCC Chairman Thomas Wheeler (filed Sept. 19, 2014).

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statutory duty to ensure that all Americans, including all Alaskans, have access to reasonably comparable, affordable, advanced broadband capability.

In ATA's most recent filing, a number of ATA members offered confidential information about the broadband performance obligations they would hope to meet should the Commission adopt the ATA Plan. This filing revealed a significant deficit in the ATA proposal: At least

[REDACTED]

acknowledge that *inadequate or unaffordable middle mile capacity is a factor limiting their broadband deployment capability even if the Commission should grant the support that ATA requests in its proposal.*³

[REDACTED]

are similarly constrained from wider broadband deployment due to the cost and unavailability of middle mile capacity.⁴

In effect, ATA's filing supports the argument that ACS has been advancing for more than a year, that the Commission's efforts to promote broadband availability to unserved locations in

³ ATA members specifically cite inadequate and unaffordable middle mile connectivity as diminishing their ability to serve unserved rural customers in greater numbers. *E.g.*, ATA November 19 Letter, Alaska Plan Performance Obligations,

[REDACTED]

Id.,

[REDACTED]

Id.,

[REDACTED]

Id.,

[REDACTED]

⁴ *See, e.g., id.*, [REDACTED].

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Alaska will achieve limited success at best unless the Commission also addresses the middle mile gap. Conversely, reallocating some of the support currently flowing to Alaska to fund middle mile for the benefit of all in unserved areas of the state, as proposed by Alaska Communications, would greatly increase the effectiveness of the Commission's last-mile investment through CAF Phase II. To the extent the Commission is inclined to adopt a program along the lines suggested in the ATA Plan, the required funding would support far greater broadband availability if the Commission also – and simultaneously – implemented ACS's middle mile proposal.

Alaska Communications urges that the Commission pursue a comprehensive broadband solution for Alaska's remote, unserved communities, and consider Alaska Communications' middle mile proposal together with universal service reform for non-price cap carriers in Alaska.

Please direct any questions concerning this filing to me.

Very truly yours,



Karen Brinkmann
Counsel to Alaska Communications

cc: Matthew DelNero
Carol Matthey
Alex Minard