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February 2, 2016

Ex Parte

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

Re: *Connect America Fund*, WC Docket No. 10-90; *Universal Service Reform Mobility Fund*, WT Docket No. 10-208

Dear Ms. Dortch,

On January 29, 2016, I spoke with Stephanie Weiner, Legal Adviser to the Chairman, about the above-captioned proceeding. I urged that the Commission proceed to adopt all of the Alaska Telephone Association's ("ATA") Consensus Alaska Plan ("Alaska Plan")[1] – including both rate-of-return LEC and CETC provisions – at the same time as it adopts Connect America Fund ("CAF") rules for rate-of-return carriers. This plan is a substantial opportunity to direct high cost universal service support in Alaska toward further wireline and mobile broadband deployment. Furthermore, with respect to CETC high cost support, the Alaska Plan substantially retargets that support to the rural areas of Alaska, and provides a specific mechanism for extending service to areas with no mobile service today.

I also explained that under the proposed rules submitted by the ATA in its ex parte of November 19, 2015,[2] the Alaska Plan framework could be adopted without delay, with each participating carrier's performance and accountability plan subject to further review and approval by the Wireline Competition Bureau, for rate-of-return ILECs, or the Wireless Telecommunications Bureau, for CETCs. Specifically, with respect to rate-of-return ILECs, proposed rule 54.306(b) states, "In order to participate in the Alaska Infrastructure Fund, a rate-of-return carrier must submit a performance and accountability plan to the Wireline Competition Bureau, and the Bureau must approve such plan." The proposed rule then describes the criteria such a plan must meet.

Similarly, for CETCs, proposed rule 54.307(b)(6) states, "In order to receive frozen support [under the Alaska Plan], a [CETC] eligible for frozen support must submit a

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[1] Attachment to Letter from Christine O'Connor, Executive Director, Alaska Telephone Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Feb. 20, 2015).

[2] Attachment to Letter from Christine O'Connor, Executive Director, Alaska Telephone Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Nov. 19, 2015).

performance and accountability plan to the [Wireless Telecommunications Bureau], and the Bureau must approve such plan."[3] The proposed rule also then describes the criteria such a plan must meet. To move this process forward more quickly, ATA members have already proposed performance and accountability plans to each Bureau.

This structure of adopting the framework, and then approving the performance and accountability plan, mirrors in a more compact form the Commission's process with respect to frozen support for non-contiguous price cap LECs. First, the Commission put the framework in place for non-contiguous price cap LECs, with the Bureau adopting an order authorizing election of frozen support,[4] and the Commission determining that it would tailor the specific service obligations to the individual circumstances of each electing non-contiguous carrier.[5] After the Commission adopts these tailored service obligations, the non-contiguous providers will make a final determination as to whether to accept or decline Phase II frozen support.[6]

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

John T. Nakahata
Counsel to General Communication, Inc.

cc: Matthew DelNero
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[3] As filed, the proposed rules read "Wireline Competition Bureau," which was a clerical error. It should have read "Wireless Telecommunications Bureau."

[4] *Connect America Fund; High-Cost Universal Service Support*, Report and Order, DA 14-534, 29 FCC Rcd. 3964, 4029 ¶ 152 (Wireline Comp. Bur. 2014).

[5] *Connect America Fund; ETC Annual Reports and Certifications; Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Obsolete ILEC Regulatory Obligations that Inhibit Deployment of Next-Generation Networks*, Report and Order, FCC 14-190, 29 FCC Rcd. 15,644, 16,662 ¶ 46 (2014).

[6] *Id*. ¶ 48.