



February 10, 2016

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, D.C. 20554

RE: **Ex parte filing** in WC Docket No. 10-90; WC Docket No. 05-337; WT Docket No. 10-208;  
WC Docket No. 14-58; WC Docket No. 07-135; CC Docket No. 01-92

Dear Ms. Dortch:

On February 9, Steve Merriam from Arctic Slope Telephone Association Cooperative (ASTAC), Dave Dengel from Copper Valley Telecom, Michael Burke from Matanuska Telephone Association, Christine O'Connor from the Alaska Telephone Association and the undersigned from GVNW Consulting, Inc. (GVNW) conducted separate ex parte meetings with Amy Bender from Commissioner O'Rielly's office and Travis Litman from Commissioner Rosenworcel's office.

Our group expressed support for the fact that the time is right for the Commission to implement the Alaska Infrastructure Fund plan. Further delay frustrates the deployment of rural broadband that is needed to bring the benefit of this platform to the customers in the state of Alaska, a region that deals with significant geographic, demographic, climatic and infrastructure construction challenges.

Mr. Burke provided an update of current middle mile activities underway in Alaska within the rural carrier community, geared to accomplish this major task without the use of federal or state universal service support funding, due to the current federal USF budget caps and the current state budget crisis<sup>1</sup> in Alaska. During the meeting, we discussed the reality that middle mile is the **step after** the FCC completes timely adoption of the consensus Alaska Plan that relates to the last mile costs. If last mile issues are not adequately addressed for Alaska, any middle mile debate is moot.

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<sup>1</sup> For more on the current state budget crisis in Alaska, please see AKFUTURE.ORG.

We also reviewed the special circumstances that create higher than average costs for carriers such as ASTAC, Copper Valley and Matanuska and the entire subset<sup>2</sup> of rural carriers serving the state of Alaska.

As required by the Commission's rules, this ex parte record is now filed in the above referenced docket. If there are any questions, please call me on 503.612.4409.

Respectfully submitted,

Via ECFS 2/10/16

Jeffrey H. Smith  
President and CEO

Copy to  
Amy Bender, FCC  
Travis Litman, FCC  
Stephanie Weiner, FCC  
Steve Merriam, ASTAC  
Dave Dengel, Copper Valley  
Michael Burke, MTA  
Christine O'Connor, ATA

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<sup>2</sup> For carriers in Alaska that provide service to one of the most resource-rich areas of our country that helps fuel the national economy, this service is provided in an environment that in many places lacks a road system, commercial power and is impacted by extreme geographical and climactic challenge. Three examples in Alaska include Copper Valley that serves territory that includes the most expensive portion to construct of the Trans-Alaska Pipeline System (TAPS), ASTAC that serves an area larger than 40 states, and MTA that serves over 10,000 square miles of service territory, taking over four hours to drive one way from one end to the other. Nor is providing broadband in these areas an average cost project under any metric.