

March 1, 2016

Ex Parte

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

Re: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support, WC Docket
No. 09-197; *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch,

On February 26, 2016, Tim Stelzig and Chris Nierman of General Communication, Inc. (“GCI”) and I met with Gigi Sohn and Stephanie Weiner of the Office of the Chairman, Eric Feigenbaum of the Office of Media Relations, and intern Gabrielle Whitehall. Separately, we met with Trent Harkrader and Charles Eberle of the Wireline Competition Bureau.

We discussed the Commission’s consideration of minimum standards for Lifeline services. We pointed out that if the Commission were to adopt a 3G or 4G LTE requirement that became effective in the next several years, it would render portions of rural Alaska ineligible for Lifeline service, which would be counterproductive because these communities are least likely to be economically developed and thus are more likely to have a high proportion of low-income residents. Upgrading these communities – and bringing mobile wireless service to communities with no such service – is a significant focus of the Alaska Plan for high cost support,¹ which has yet to be adopted by the Commission. However, even under the Alaska Plan, given the fact that some communities will remain on satellite backhaul for the foreseeable future, requiring 4G LTE, high data throughput or substantial included usage could make Lifeline infeasible in some communities in Alaska.

We also urged that the Commission continue to define “tribal lands” in Alaska by reference to the Bureau of Indian Affairs’ definition of “reservation,” which includes “Alaska Native regions established pursuant to the Alaska Native Claims Settlement Act.”² As GCI

¹ See Letter from Christine O’Connor, Executive Director, Alaska Telephone Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90, at Attach. (filed Feb. 20, 2015).

² See Comments of General Communication, Inc. on Second Further Notice of Proposed Rulemaking at 10-11, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 31, 2015) (“Comments”); see also Reply Comments of General Communication, Inc. on Second

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explained in its comments, even Anchorage is substantially less dense in population – by an order of magnitude – than other communities about which the Commission inquired in the NPRM.³ Moreover, given Alaska’s highly migratory population and seasonal work, differentiating Lifeline support in Anchorage from the rest of Alaska would be highly disruptive to workers who migrate in and out of Anchorage for jobs (such as for fishing, oil fields, guiding and construction), as well as difficult to enforce.⁴

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: Gigi Sohn
Stephanie Weiner
Eric Feigenbaum
Gabrielle Whitehall
Trent Harkrader
Ryan Palmer
Charles Eberle
Jay Schwartz

Further Notice of Proposed Rulemaking at 4-5, WC Docket Nos. 11-42, 09-197, 10-90 (filed Sept. 30, 2015) (“Reply Comments”).

³ See Comments at 13-15.

⁴ See Comments at 6-8, 15-16; *see also* Reply Comments at 5-6.