



March 3, 2016

Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
2550 M Street, NW
Washington, DC 20037

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:

Earlier today, Chris Nierman and I of General Communication, Inc. (“GCI”) met with Nicholas Degani of Commissioner Pai’s office and Travis Litman of Commissioner Rosenworcel’s office.

The purpose of the meetings was to discuss the reform and modernization of the Lifeline program. 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, 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.” We understand that some have proposed limiting enhanced tribal support to low density areas or to providers that have invested in their own network facilities in an area where they seek enhanced support. As GCI 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. 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

