March 4, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 20554

Re: *Ex Parte* Communication of Alaska Communications, WC Docket No. 10-90

Dear Ms. Dortch:

In response to questions posed by the staff of the Wireline Competition Bureau, Alaska Communications hereby provides the following information to supplement its February 3, 2015 proposal for broadband deployment commitments in Alaska using CAF Phase II frozen support.

First, Alaska Communications clarifies that it is not aware of any locations within the 26,000 it proposes to serve using CAF Phase II frozen support that lack terrestrial backhaul facilities. As such, Alaska Communications does not expect that any of these locations would qualify for the more limited broadband speed and performance standards permitted in such areas that lack terrestrial backhaul.[1]

Second, Alaska Communications clarifies that its proposal to deploy broadband "at speeds of at least 10 Mbps downstream/1 Mbps upstream and meeting the other FCC CAF Phase II parameters for latency, capacity and price"[2] encompasses the evolving usage minimum that the Bureau adopted for price cap carriers accepting model support, namely, a "minimum usage allowance for Connect America funded locations [that] is at least 100 GB and is at or above the usage level for 80 percent of all of its broadband subscribers,

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[1] *See Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17663 (2011) at ¶ 101 (subsequent history omitted).

[2] *Connect America Fund*, WC Docket No. 10-90, *Ex parte* Letter from Karen Brinkmann, Counsel to Alaska Communications (filed Feb. 3, 2015), at 2.

including those subscribers that live outside of Phase II funded areas."[3] Alaska Communications currently does not impose any data usage cap on its customers' broadband Internet access services.

Should you have any further questions, please do not hesitate to contact me at (202) 230-4962, or richard.cameron@acsalaska.com.

Very truly yours,

Richard R. Cameron
Legal Consultant

Digitally signed by Richard R. Cameron
Date: 2016.03.04 15:06:51 -05'00'

[3] *Connect America Fund*, WC Docket No. 10-90, Report and Order, DA 13-2115, 28 FCC Rcd 15060 (2013), at ¶ 18.