
Alaska Telephone Association

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Christine O'Connor
Executive Director

March 8, 2016

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
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:

Alaska Telephone Association (ATA) files these written ex parte comments regarding the issues under consideration in the Lifeline and Link Up Reform and Modernization dockets listed above.

The Second FNPRM proposes to establish minimum standards for Lifeline services and discusses average usage across 3G and 4G wireless networks.¹ We are concerned that setting 3G service as a baseline for mobile broadband service supported by Lifeline will exclude thousands of Alaskan consumers from the benefits of Lifeline and place our wireless providers in the very difficult quandary of being required to offer Lifeline service as a condition of ETC status while being unable to offer a qualifying level of service.

ATA member companies have been diligent in deploying wireless services across Alaska and are continually improving our wireless networks. But because of the extremely high costs to construct and operate networks in Alaska, 2G wireless service has only recently reached many areas of Alaska and significant investment is still required to upgrade to 3G and higher service. In February 2015 ATA member companies proposed the Alaska Plan which would stabilize and rationalize universal service high cost funding in Alaska.² In November 2015 Alaskan providers submitted performance obligations detailing broadband service improvements which will be enabled by the Alaska Plan.³ Over the past week all Alaskan wireless providers have held ex parte discussions with the Wireless Telecommunications Bureau to discuss new and upgraded wireless broadband service which will be provided in accordance with the performance obligations defined in the Alaska Plan.⁴ Those conversations demonstrated that exciting progress can be made in wireless broadband service in Alaska but also that current wireless service is limited to voice in many areas.

The Alaska Plan will allow our providers to sustain, upgrade and extend broadband networks across Alaska, including wireless broadband service. However, even with adoption of the Alaska Plan, these improvements will take years to accomplish, and in the interim not all areas of Alaska

¹ See Second Further Notice of Proposed Rulemaking, adopted June 18, 2015 in Docket 11-42 at paragraph 44.

² See ex parte notice filed by ATA in Docket 10-90, February 20, 2015.

³ See ex parte notice filed by ATA in Docket 10-90 November 19, 2015.

⁴ See ex parte notices filed by ATA in Docket 10-90 March 3, 2016.

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will have access to 3G service. It is important that minimum standards for Lifeline recognize this limitation and do not exclude Alaskan consumers from participating in the Lifeline program.

ATA also urges 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."⁵ Alaska's communities, even the largest, are much lower in density than areas under evaluation in the Lower 48 and our Lifeline participants move between extremely remote and more urban areas of Alaska seasonally for subsistence, economic and social purposes. Tribal designation throughout Alaska continues to be appropriate for the population and activities of Alaskans.

Pursuant to Section 1.1206 of the Commission's rules, this ex parte letter is being filed via ECFS in WC Dockets 11-42, 09-197, and 10-90.

Respectfully submitted,

Via ECFS 3/8/2016

Christine O'Connor
Executive Director

cc: Stephanie Weiner
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⁵ See comments filed by GCI in Docket 11-42 March 1, 2016, and USF-ICC Transformation Order at paragraph 126, footnote 197.