



March 11, 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 Amy Bender of Commissioner O’Rielly’s office.

We discussed the reform and modernization of the Lifeline program, focusing primarily on the Commission’s proposed adoption of minimum standards for Lifeline services that could render portions of rural Alaska ineligible for Lifeline service. Such a result would be counterproductive. Many of the communities without access meeting those standards are the most remote, the most isolated, and the most economically challenged, and thus are more likely to have a high proportion of low-income residents. Upgrading service to 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. Even under the Alaska Plan, however, some communities will remain on satellite backhaul for the foreseeable future. Accordingly, requiring 3G data for mobile services and 10 Mbps downloads/1 Mbps uploads with a monthly minimum usage allowance of 150 GB could make Lifeline service infeasible in some communities in Alaska, and even where feasible could raise the price of Lifeline offerings beyond what many Lifeline eligible households can afford.¹

GCI shares NTIA’s concerns regarding the adoption of minimum service standards for broadband.² Robust minimum service requirements are likely to reduce provider participation in the Lifeline program and thus undermine a stated goal of a majority of the Commission. In addition, as NTIA states, “[r]ural and other areas with limited service options may fall further beyond the digital divide if providers are unwilling or unable to meet the Commission’s

¹ *Chairman Wheeler and Commissioner Clyburn Propose Rules to Modernize Lifeline Program to Provide Affordable Broadband for Low-Income Americans* (rel. Mar. 8, 2016), available at <https://www.fcc.gov/document/fact-sheet-lifeline-modernization-proposal>.

² NTIA *Ex Parte* Comments at 12–13 (filed Mar. 9, 2016), available at <http://apps.fcc.gov/ecfs/document/view?id=60001530403>.

