



March 23, 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:

On March 21, Tim Stelzig and I of General Communication, Inc. (“GCI”) met with Rebekah Goodheart, Legal Advisor to Commissioner Clyburn.

We discussed the reform and modernization of the Lifeline program, primarily focused on the Commission’s proposed adoption of minimum broadband standards that could render portions of rural Alaska ineligible for Lifeline service. Such a result would be counterproductive because these communities are likely to be 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, requiring 3G mobile data would exclude a significant number of low-income residents of Remote Alaska from the Lifeline program.¹

By our best estimate, Remote Alaska contains at least 100 communities with a combined population of more than 40,000 that have access only to a 2G network. A few years ago, many of those consumers had no wireless service at all. As Alaska wireless providers continue to build out and upgrade service in rural Alaska, the Commission should not make it more difficult for such communities to afford the best service currently available.

The Commission should prevent such an outcome by exempting areas of rural Alaska that lack 3G-capable networks. The Commission could accomplish this result by applying the minimum standard only where commercial 3G service is offered. Alternatively, and simpler to

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>.

