



March 24, 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 22, I spoke with Stephanie Weiner, Senior Legal Advisor to Chairman Wheeler regarding the reform and modernization of the Lifeline program. The discussion focused primarily on GCI's concern that the proposed 3G minimum broadband standard for mobile Lifeline services could render consumers in portions of rural Alaska ineligible.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 available.

The Commission has a number of options to avoid such a result. The Commission could, for example, apply the minimum standard only where commercial 3G service is offered. Alternatively, and simpler to implement, the Commission could exclude all facilities-based Alaska wireless carriers from the 3G minimum requirement.² As a last resort, the Commission

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 To the extent that the lack of 3G networks is a problem elsewhere in the country, the Commission could exempt all facilities-based wireless providers that have networks that are not 3G capable.

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could solicit waiver requests from carriers that offer 2G service in certain areas. That solution, however, would create uncertainty, cause delay, and unnecessarily tie up Commission and carrier resources. If the Commission nonetheless decides to rely on a waiver process, GCI urges consideration of joint waiver requests so that similarly-situated carriers could spread the efforts and reduce the number of waivers before an already-stretched Commission staff. There are other potential solutions, and we will work with the Commission to find one that both fulfills its goals and protects low-income consumers in rural Alaska.

As we continue to build and upgrade, in large part based on the future certainty of the Alaska Plan, the number of communities and people limited to 2G service will decrease. While that is moving forward, however, the Commission should not prevent the least well off consumers in the hardest-to-serve communities from accessing the benefits of a program specifically designed to close the digital divide.

Please contact me if you have any questions.

Sincerely,

/s/

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cc: S. Weiner