
Alaska Telephone Association

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May 6, 2016

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

RE: Ex parte filing in WC Docket No. 10-90, WT Docket No. 10-208

Dear Ms. Dortch:

The Alaska Telephone Association (“ATA”) shares the views expressed by General Communication, Inc. (“GCI”) in its letter of May 3, 2016.¹ The Alaska Plan reflects a consensus proposal to bring modern broadband services—wireline and mobile—to thousands of consumers in remote Alaska without increasing the amount of high-cost support going to Alaska. ATA signatories are eager to make further investments in remote Alaska—enabled by a fixed amount of high-cost support over ten years—for the benefit of the communities they serve.

Like GCI, ATA disagrees with Alaska Communications Systems (“ACS”) that the competitive eligible telecommunications carrier (“CETC”) portion of the Alaska Plan should be disapproved, delayed, or subject to ACS’s proposed conditions. First, as ATA has stated before, the Alaska Plan is an integrated whole.² The signatories have proposed their performance commitments on the assumption that the Alaska Plan will simultaneously address support for rate-of-return carriers and CETCs. By creating holistic build-out plans, the companies can take advantage of the network synergies from upgrading their wireline and mobile networks together. Removing or delaying the CETC components of the Plan would affect not just the mobile improvements, but the wireline improvements as well.

Like GCI, the other ATA signatories took middle mile costs into account as they prepared their proposed performance commitments. As ACS acknowledges, middle mile is an expensive input, given the very challenging terrain, climate, and land use restrictions in remote Alaska. Notwithstanding those challenges, several Alaska Plan signatories, like GCI, have made substantial investments to deploy fiber, microwave, and subsea cable middle mile solutions:

- Alaska Power & Telephone built the Southeast Alaska Microwave Network, which spans the entire 400 mile length of southeast Alaska.
- The Arctic Slope Telephone Association Cooperative (“ASTAC”) built more than 100 miles of microwave facilities and will spend \$1.5M in 2016 for capacity upgrades to those facilities.

¹ See Letter from John T. Nakahata, Counsel to General Communication, Inc., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90, WT Docket No. 10-208 (May 3, 2016).

² See, e.g., Letter from Christine O’Connor, Executive Director, Alaska Telephone Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (Feb. 3, 2016); see also Letter from John T. Nakahata, Counsel to General Communication, Inc., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90, 05-337, 14-58, 07-135, WT Docket No. 10-208, CC Docket No. 01-92 (Jan. 14, 2016), at 3.

In addition, ASTAC is an investor in Quintillion Networks, which is deploying subsea cable to connect the villages of Nome, Kotzebue, Wainwright, Point Hope, Barrow, and Prudhoe Bay. ASTAC's investment helped the project develop sufficiently to attract its main investor.

- Copper Valley Telecom deployed microwave and fiber optic facilities to a number of small, rural villages.
- The Cordova Telephone Cooperative deployed a 100-mile subsea cable to connect its service area directly to existing fiber facilities, and has also built 200 miles of microwave facilities to connect remote cell sites to the fiber backbone.
- Ketchikan Public Utilities constructed a microwave system from Ketchikan to Canada, creating a redundant terrestrial middle mile network.
- Matanuska Telephone Association built extensive fiber and microwave middle mile throughout its study area.
- Nushagak Electric & Telephone Cooperative, Inc. built a fiber network to the village of Aleknagik and is currently upgrading microwave systems to two additional villages it serves.
- TelAlaska has deployed fiber to connect Moose Pass to Cooper Landing.

These investments show both that, with support from federal and state programs, private companies can invest in middle mile facilities even in the most challenging environments, and that GCI is not the only provider in Alaska to do so. No onerous conditions on middle mile facilities will help bring better services to remote Alaska consumers.

The Alaska Plan is the best proposal for bringing improved service to some of the most difficult to serve customers in the country. ATA urges the Commission to adopt it expeditiously as proposed.

Respectfully submitted,

Via ECFS 5/6/2016

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