
Alaska Telephone Association

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May 31, 2016

Ex Parte

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

RE: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

Alaska Telephone Association's ("ATA") members are committed to providing broadband service to our communities. We have brought connectivity across Alaska for decades and today provide essential broadband service to thousands of Alaskans. On February 18, 2015 ATA's rate-of-return and competitive carriers submitted a specific plan to reform high-cost support in Alaska to enable new and upgraded broadband service to more Alaskans, all without increasing the high-cost support for Alaska. Over the past 15 months we have developed and discussed the Alaska Plan in detail and on May 9, 2016 each company submitted a schedule defining the broadband service it will be able to provide with the support of the Alaska Infrastructure Fund ("AIF"). The AIF targets high-cost support to remote Alaska where it is most needed and will sustain and improve broadband service to many thousands of Alaskans.¹

Recent filings have recommended the FCC disregard the unified voice of Alaska's rate-of-return and competitive providers and set aside the AIF. The AIF promises specific and significant improvements to broadband services for Alaskans living in remote areas. Without the AIF Alaska's providers will remain in a limbo of uncertainty and declining support. Delaying the AIF harms not only our providers, but more importantly the consumers they strive to serve. Alaska's fixed and wireless providers have specific projects ready to deploy this year with the support of the AIF. Without the AIF projects will be shelved and Alaskans will be deprived.

Alaska Plan signatories are concerned about recent proposals to impose stringent conditions on support for broadband in Alaska.² Fair rules of the road are essential. However, the conditions proposed are not reasonable and would impede broadband. Requiring all broadband facilities constructed or operated with high-cost support to meet national speed, usage and latency criteria prevents operation, construction and upgrade of networks in the most remote places in Alaska. Extremely high costs may still allow broadband facilities to be constructed to remote villages, but at a lower speed and capacity than can be delivered nationally. This is still a crucial improvement and should not be prohibited by unrealistic criteria. Mandating urban rates would prevent deployment as well. Artificial urban rates, which are completely disconnected from conditions and costs in remote Alaska, destroy any possible business case and would stop new broadband projects in their tracks. In the same vein, the proposal to require letters of credit would be an unattainable requirement and prevent most of Alaska's fixed and wireless providers from constructing and operating broadband service because they are unable to secure a letter of credit.

¹ See Notice of Ex Parte filed by Alaska Telephone Association in WC Docket 10-90 May 9, 2016 which details individual company performance obligations and summarizes improvements proposed by fixed and wireless companies.

² See Letter filed April 21, 2016 by Karen Brinkmann on behalf of Alaska Communications proposing deployment and operating criteria for use of high-cost funds in Alaska.

The Alaska Plan signatories have demonstrated sustained commitment to broadband service in Alaska. We've proposed and refined a targeted plan which integrates both fixed and wireless providers to serve the most Alaskans possible, as quickly as possible. Tens of thousands of Alaskans will benefit from the improvements we commit to in the AIF. Delaying or deconstructing the Plan will eliminate the promise of significant improvements in broadband service for Alaskans. We respectfully urge the Commission to adopt the Alaska Infrastructure Fund quickly.

Sincerely,

/s/ via ECFS 5/31/2016

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