

October 22, 2008

FILED VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communication Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Intercarrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68 High-Cost Universal Service Support, WC Docket 05-337 Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

GTA Telecom, LLC ("GTA") offers the following comments to assist the record in the above-referenced dockets. GTA, an incumbent local exchange provider located 7,000 miles west of the United States in the Marianas Islands and wishes to convey its concerns regarding information that has become known about Chairman Martin's proposed ordering being circulated to the FCC Commissioners for review.

GTA is very concerned that insular issues specific to Guam have not been addressed. It appears that Chairman Martin has addressed special situation for Alaska, Hawaii, and Puerto Rico but has not specifically addressed the special needs and concerns of Guam. A further concern about Chairman Marlin's proposed order, if adopted, would be the mandates broadband coverage required in order to receive federal universal service funds. GTA would be unable to obtain the resources needed to pay for continued upgrades required to meet Chairman Martin's mandate if funding mechanisms are cut or capped. GTA cannot continue to deploy broadband networks if intercarrier compensation rates are reduced, or otherwise placed in jeopardy because of the misapplication of rates to voice calls that can be caused by the regulatory treatment afforded to IP-enabled services or ISP-bound traffic, and if the USF funds are capped at 2008 levels.

GTA's Specific Difference from Continental United States

GTA's needs and circumstances are very different from any other carrier overseen by the FCC. Specifically, GTA's cost of transport for Internet and voice traffic is greater than other mainland carriers. GTA recently upgraded its carrier capacity between Guam and the mainland United States at an estimated cost of \$1.8 M and continues to pay the high cost of transport to provide internet services across a 7,000 mile loop from Guam to Los Angeles and Portland. Secondly, Guam faces different logistical processes from the U.S. mainland. There is a vast ocean distance between Guam and the mainland, costs of goods is much higher and GTA faces long lead times for equipment relying heavily upon overseas shipping for equipment needed to keep its network operational.

Until 2005, GTA (formerly known as the Guam Telephone Authority) was owned by the government of Guam. Since privatization, GTA Telecom, LLC has invested almost \$38M in upgrading a neglected telephone network and has begun offering broadband services to the people of Guam. In just 3 ½ years since it began private operation, GTA has been able to deploy broadband services to nearly 98% of the island of Guam. However, the requirement to continue to build out its network to very remote parts of an island without the continued support would have devastating consequences for GTA. GTA recently estimated that it would cost \$200K to provide broadband and upgraded cable facilities to 19 residential homes in a remote part of the island. Providing broadband services via satellites is not an option for GTA since those types of technologies are available to mainland U.S. but not in the remote Pacific region for Guam.

GTA urges the Chairman to recognize that Guam's costs are higher than the continental U.S. and that it would GTA similarly with the treatment afforded to carriers in places like Alaska, Hawaii, and Puerto Rico and will address those needs separately. GTA would ask that the Commission would reject the proposed order until the unique needs of Guam are taken into account.

Sincerely,

/s/ Eric N. Votaw

Eric N. Votaw
Vice President – Marketing & Regulatory

cc: Chairman Kevin J. Martin
Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell