

February 23, 2008

Ex Parte

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

Re: *Federal-State Board on Universal Service*, CC Docket No. 96-45;
High-Cost Universal Service Support, WC Docket No. 05-337;
Wireless E911 Location Accuracy Requirements, PS Docket No. 07-
114; *Broadband Industry Practices*, WC Docket No. 07-52

Dear Ms. Dortch:

On February 19, 2009, Ron Duncan, Greg Chapados, and Tina Pidgeon, of GCI, and I met separately with Acting Chairman Copps, Scott Deutchman, his Competition and Universal Service Legal Advisor, and Jennifer McKee, Chief, Telecommunications Access Policy Division, and then with Commissioner McDowell, along with Angela Giancarlo, his Chief of Staff and Senior Legal Advisor, and Nick Alexander, his Legal Advisor. On February 20, we met with Commissioner Adelstein and Scott Bergmann, his Senior Legal Advisor. In each meeting, GCI discussed its statewide rural wireless roll-out and, consistent with its related prior filings, the need to expeditiously resolve outstanding issues to implement the Alaska Native region and tribal lands exception to the CETC interim cap on high cost universal service.

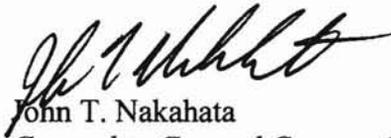
GCI also reiterated that E911 accuracy location rules must take into account the unique nature of service in Alaska's rural areas. First-time deployment of wireless services in rural areas is a significant advancement in public safety, allowing public safety officials responsible for covering large territories to better serve communities that otherwise lack modern 911/PSAP arrangements. Failure to consider the unique challenges of serving these areas not only would threaten the ability to offer the service, which would be a significant step backwards for public safety.

Finally, GCI discussed the throughput and economic constraints on delivering broadband services via satellite transport links. Any consideration of broadband definitions or network management practices should take into account these service realities, to ensure that efforts to provide service are not unintentionally impeded by measures arbitrarily applied in a satellite environment.

The attached documents were provided as a part of the discussion.

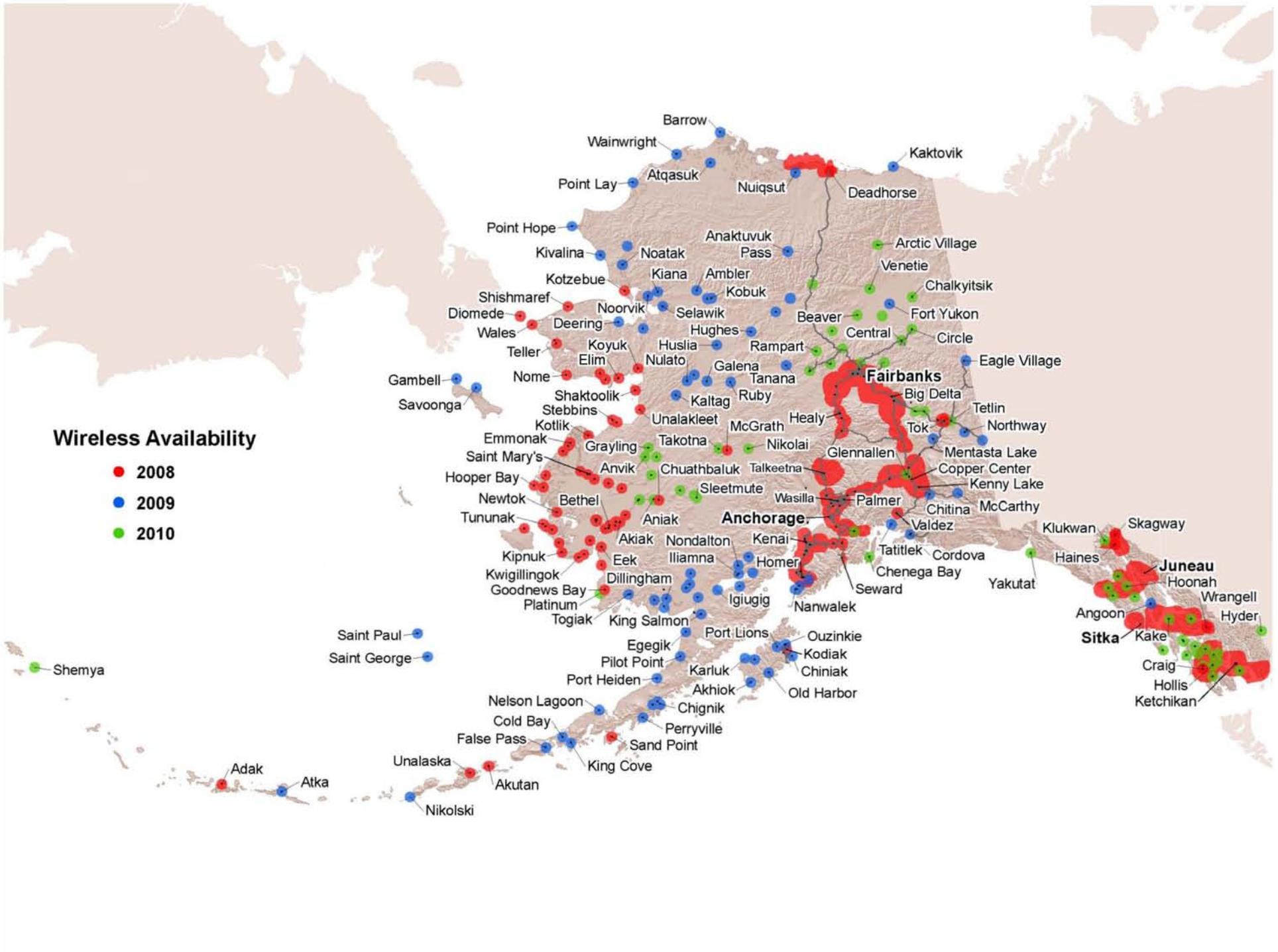
Please address any questions to the undersigned.

Sincerely,



John T. Nakahata
Counsel to General Communication, Inc.

Cc: Michael J. Copps
Scott Deutchman
Jennifer McKee
Robert M. McDowell
Angela Giancarlo
Nicholas Alexander
Jonathan S. Adelstein
Scott Bergmann



Cell phones the latest rage in Bush Alaska

ALEX DEMARBAN

alex@alaskanewspapers.com

December 05, 2008 at 8:34AM AKST

The cellular age has finally reached village Alaska in a big way.

As a result, villagers are signing up to get cell phones in droves, praising benefits they say will range from quicker backcountry rescues to staying in touch with large families sprawling the state.

GCI, which bills itself as Alaska's largest telecommunications company, launched the village cellular service in dozens of communities in recent weeks.

For now, the company is blanketing two regions in Western Alaska – the Seward Peninsula and the Yukon-Kuskokwim Delta. But officials promise to have cell phones chirping in all the state's villages by the end of 2010.

The cell phone became mainstream technology in most of America more than a decade ago, but in rural Alaska the service has generally been restricted to hub cities such as Bethel. It also existed in a few village clusters where pioneering companies sometimes provided limited or costly plans.

The response to GCI's new village service has been "pretty crazy," said Sara Huff, the wireless operations manager in Anchorage.

The company turned on cellular service in 13 communities in the Nome region near Norton Sound in mid-October. There, officials expected to have 225 new customers by the end of the year.

They had 800 by early December.

The cell phones are also a big hit in 36 villages near the lower Yukon and Kuskokwim rivers, said Toni Crosby, head of GCI's office in Bethel.

The technology arrived in that region in early November. The company expected about 300 new customers within two months, Crosby said. Instead, 1,000 people signed up in half the time.

GCI officials traveling to those villages to explain various plans have been mobbed with inquiries, especially how to get a phone, she said. The questions start when the officials land at the village airstrip and don't let up until the GCI workers leave the village several hours later.

"People are loving it," she said.

Every village

As for GCI's plans in the rest of the state, the company intends to add 59 villages next year, including around the hub communities of Kotzebue, Barrow and Dillingham. They also plan next year to expand cell service in the Copper Valley region and to villages in the Aleutian and Pribilof islands that don't yet have it, said Dan Boyette, vice president of rural consumer service.

To provide the service, GCI first built up its telecommunications infrastructure across the state, including through acquisitions of some rural companies, he said.

Assisting with the effort is a longtime federal subsidy provided by the Universal Service Fund, a fee collected from long-distance calls that subsidizes telecommunications service in rural and poor communities.

"Federal supports helps, but it was just time for us to do this," Boyette said. "The wireless business is the way the world is going."

Villages have wanted cell phone coverage like the rest of America has had for years, he said.

"It's finally time for rural Alaska to be included in that," he said.

ACS, a rival of GCI that calls itself Alaska's leading provider of wireless and broadband services, provides wireless in Southeast and in areas generally associated with the state's road system, including in Anchorage and Fairbanks, according to its Web site. It also provides wireless in the hub communities of Nome, Barrow and Kotzebue, as well as at a few spots associated with the oil industry out of Prudhoe Bay.

An ACS official, asked whether the company planned to expand cell service in villages, said this:

"Our basic message is we already cover over 80 percent of the Alaska population with our wireless coverage, including along Alaska's major communication corridors, so we're really happy about that," said Paula Dobbyn, director of corporate communications.

She said a large part of the company's focus in the last year has been installing an undersea fiber optics cable from Anchorage to the Lower 48. The cable will boost bandwidth in Alaska and allow people to digitally move large amounts of protected information. For example, an oil company in Alaska might use it to send seismic exploration data to Houston, Tex.

Fish camp is calling

As for GCI's efforts in the Bethel region, most new customers have bought the plan that provides unlimited long-distance calls in Alaska, free calls to other GCI cell phones around the country and unlimited texting, all for \$54.99 a month, said Crosby.

It's the same price offered to Anchorage residents. Rural parents want it to give the phone to their children, who have left the village to attend college or boarding schools, she said.

"The parents say the kids have no excuse not to call," Crosby said.

The cell phones could help people with subsistence activities.

One GCI employee recently called the Bethel office from fish camp, Crosby said. And a different GCI employee returning from a moose hunt called someone in Bethel on his cell phone as he approached town — he needed a truck to haul the moose meat into town, she said.

GCI's cell phone signals, usually sent from 60-foot towers in each village, are not meant to work between villages, Boyette said.

But coverage overlaps in villages that are close together or in some places where trees and mountains don't obstruct the line-of-sight radio signal. That "residual coverage" also exists in a few areas where cell phone towers exceed 60 feet, Boyette said.

One place with overlapping signals is between the communities of Napaskiak, Napakiak, Oscarville and Bethel, Boyette said.

In that area, like many parts of rural Alaska, local rescue teams are often called upon to save lives, said Ben Beaver, of Napakiak. The cell phone could allow stranded travelers on the tundra the chance to get quick assistance with a phone call.

"If the snowmachine breaks down or people are lost, they could call help," he said.

The public safety officer in the village of 375, Beaver spoke by one of the new cell phones, bought by the local governing body to help him with his job.

The cell phone will be especially useful for village public safety officers, he said. They'll be reachable wherever they go, whether in the Lower 48 or when they respond to emergencies in neighboring villages.

Mark Olick, the maintenance man at the Tuntutuliak school, said he's one of about 30 people in the village of 400 who have bought the new cell phone.

Speaking on that new phone to an Anchorage reporter — the connection was garbled early in the conversation but remained clear for several minutes — Olick called the technology "a good thing" for rural Alaska.

The signal in his village is strong, he said. He recently traveled seven miles outside the village and the phone still worked.

Olick got one for himself and his wife. He bought the unlimited-in-Alaska plan so he could call family in Bethel and Anchorage without worrying about exceeding minutes.

But he's guarding the new phone number so he doesn't get calls at odd hours. People already keep his land-line phone ringing, asking whether he can open the school gymnasium so kids can play.

"They keep calling nonstop," he said.

Alex DeMarban can be reached at 907-348-2444 or 800-770-9830, ext. 444.

The **TERRA** Project

TERRA is GCI's vision for a long term network to serve rural Alaska. It builds off of GCI's success with DeltaNet – the microwave network serving the Bethel region. DeltaNet is financially successful and has been well received by customers. GCI has had inquiries from other customers about similar networks and is exploring their feasibility.

Some terrestrial service delivery is necessary if rural Alaska is to obtain the full benefit of modern telecommunications. Current Internet growth projections point to the fact that in the future, at least for Alaska's larger rural communities, urban-quality high speed internet access and other state of the art technologies can not be effectively delivered by satellite links alone.

The TERRA concept is highly speculative. Its total cost and the potential returns are not known. If it is built, it could take as long as ten years to complete. Portions of it would require new technology. There is currently no business case or financing for it. While GCI would like to lead the development of such a network, its successful deployment would require partnership with and cooperation from many other entities serving rural Alaska.

Construction of all or parts of TERRA would also require the continuation of certain existing support mechanisms in rural Alaska, the possible creation of new ones, the availability of grant funding for portions of the network and a vision for long term economic viability in rural Alaska.

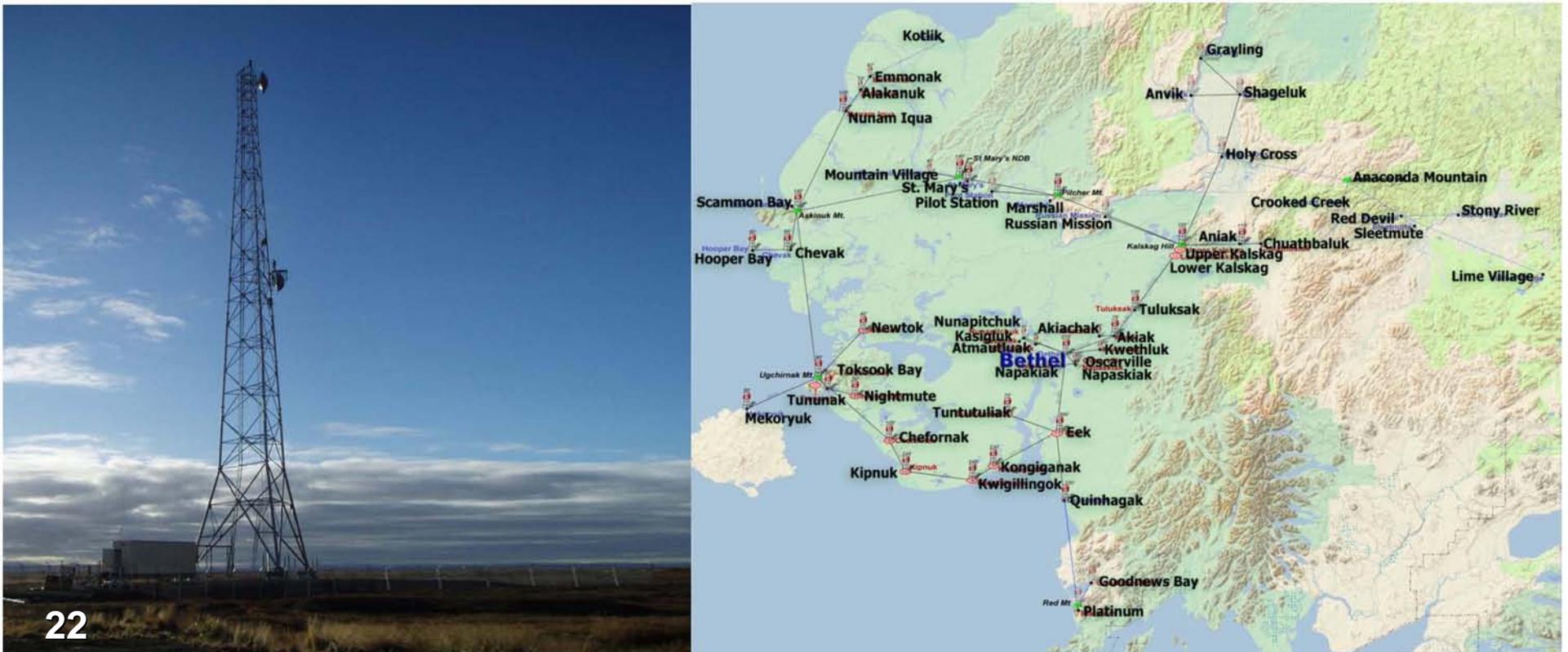
GCI plans to work with others interested in the development of rural Alaska to see if the TERRA vision can be brought to fruition.



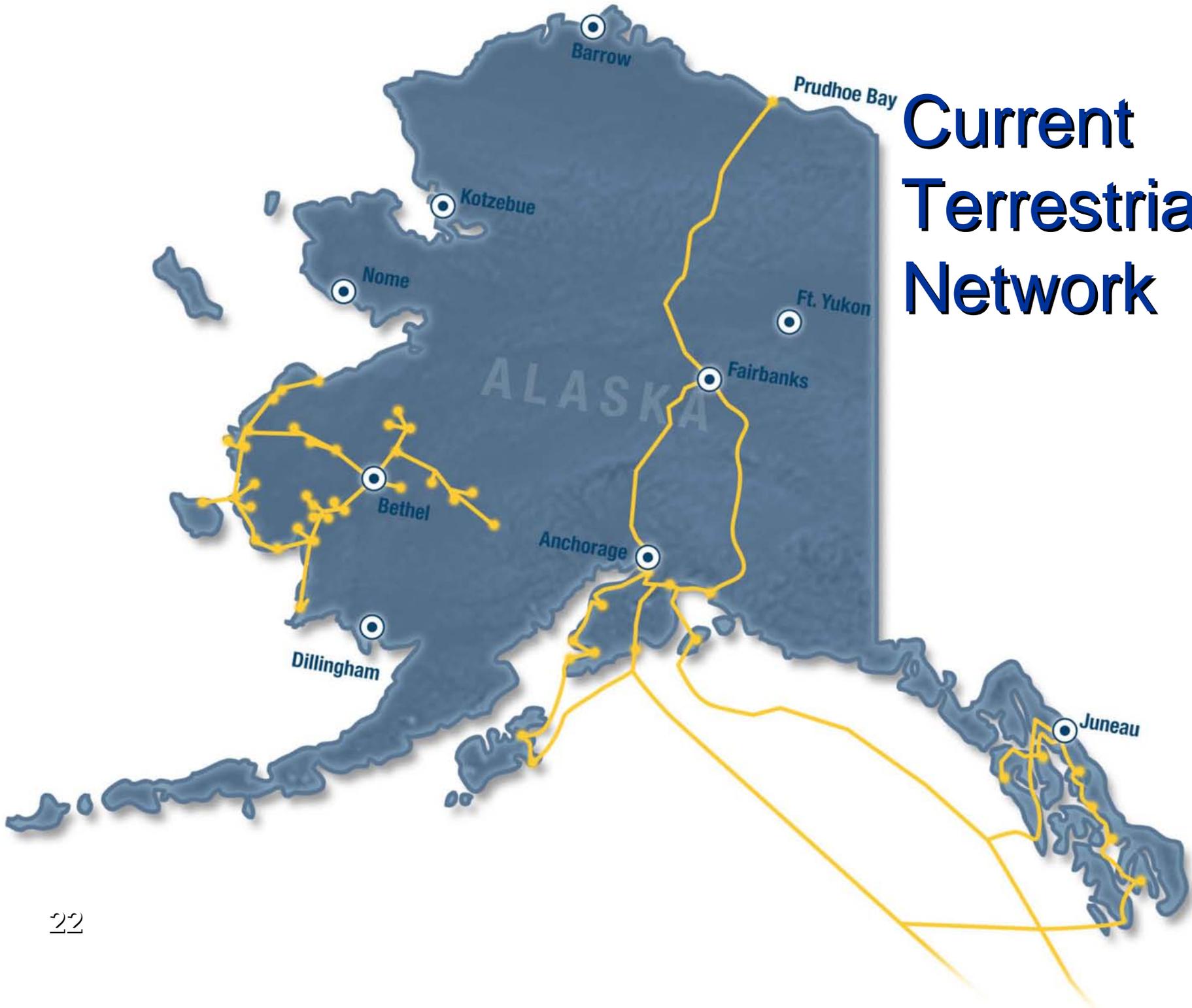
The TERRA Project

Terrestrial for Every Region of Rural Alaska

- From DeltaNet to a ringed rural architecture
- A vision of terrestrial connectivity for rural Alaska



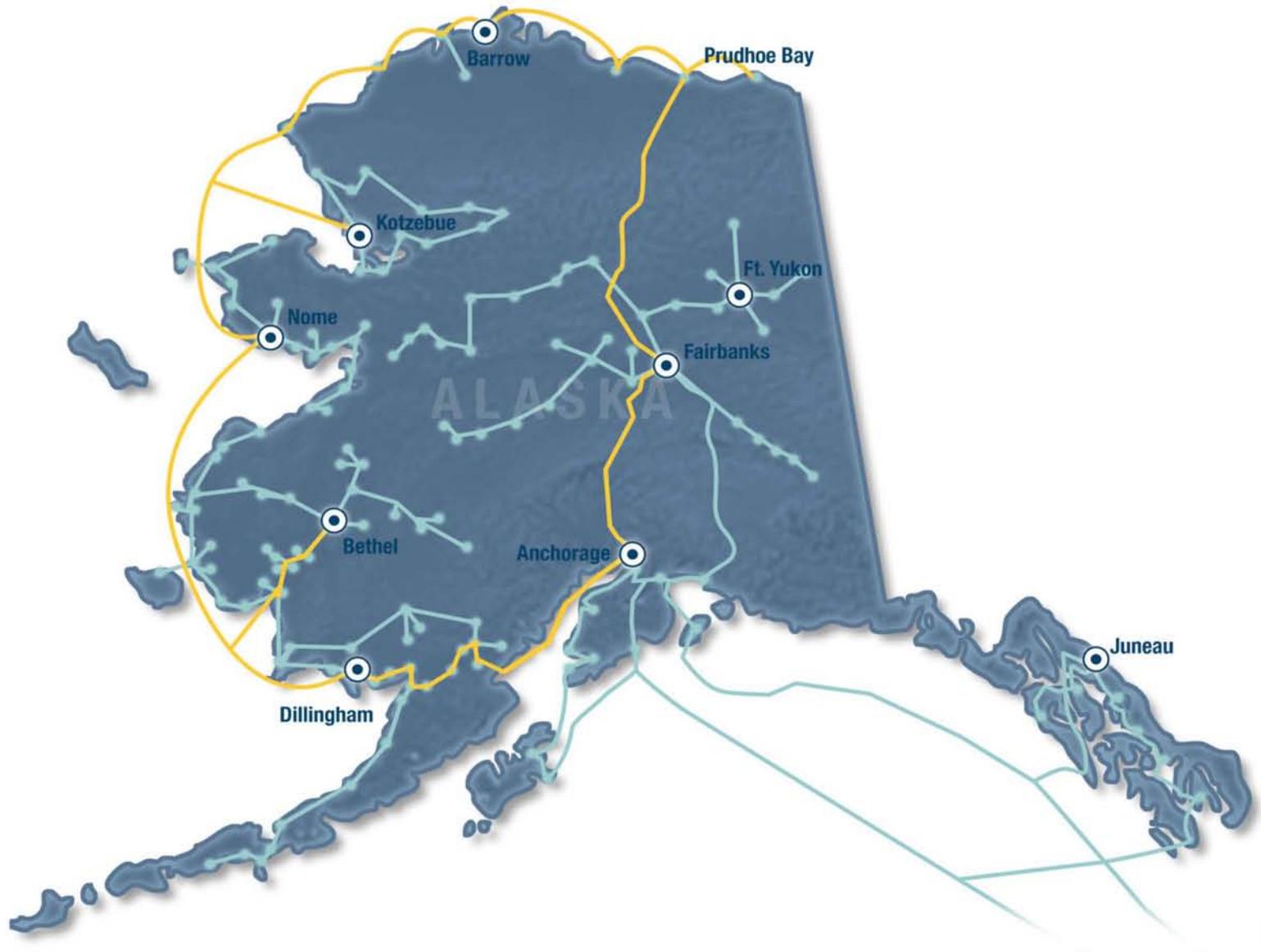
Current Terrestrial Network



Regional Networks



Completed Network



GCI – University of Alaska Research Partnership

- **Focus on technologies that benefit Alaska**
- **Rural emphasis**
- **Each party bears own costs**
- **May jointly apply for grants**
- **Share any resulting intellectual property**

