



February 2, 2010

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VIA ELECTRONIC FILING

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

Re: *International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act; A National Broadband Plan for Our Future; Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion and Possible Steps to Accelerate Such Deployment Pursuant to section 706 of the Telecommunications Act; Federal-State Joint Board on Universal Service; Federal-State Joint Board on Universal Service High-Cost Universal Service Support, GN Docket Nos. 09-47, 09-51, and 09-137, CC Docket No. 96-45 and WC Docket No. 05-337, Notice of Oral Ex Parte Presentation*

Dear Ms. Dortch:

On February 1, 2010, on behalf of GCI, Chris Nierman and I, along with John Nakahata of Wiltshire & Grannis, met with Sharon Gillett, Donald Stockdale, Amy Bender, Randolph Clarke, and Katie King of the Wireline Competition Bureau regarding the above-referenced proceedings. GCI summarized the points made in its comments on NBP Public Notice #5 regarding broadband deployment and adoption on tribal lands, as well as NBP Public Notice #11 regarding middle mile deployment, and NBP Public Notice # 19 regarding universal service.¹ GCI underscored that: at least comparable revenue flows from the Universal Service fund as a whole are necessary to be able to address the entire Alaska market; high cost support at current levels is critical to continued deployment and maintenance of end user distribution networks (which serve dual voice and broadband functions) in Alaska, as with all Tribal Lands; and allowing use of high-cost funds to support broadband network upgrades across a carrier's high-cost areas, irrespective of service area boundaries, would help further broadband deployment efforts. The attached documents were provided as part of the discussion.

¹ See, e.g., Comments of General Communication, Inc. – NBP Public Notice #5, GN Docket Nos. 09-47, 09-51, and 09-137 (filed Nov. 9, 2009); Comments of General Communication, Inc. – NBP Public Notice #11, GN Docket Nos. 09-47, 09-51, and 09-137 (filed Nov. 4, 2009); Comments of General Communication, Inc. – NBP Public Notice #19, GN Docket Nos. 09-47, 09-51, and 09-137 (filed Dec. 7, 2009).

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In discussing GCI's planned and proposed microwave/fiber broadband deployments in rural Alaska, Commission staff asked about GCI's microwave backhaul capacity and the possibility of using WiMax technology. GCI envisions microwave backhaul capacity of approximately 1Gbps, with potential expansion to 2Gbps over time. In this instance, and based on the geographic and topographic features of the specific service areas, GCI does not believe that WiMAX, which also operates over microwave, would provide service improvements over GCI's planned point-to-point, line-of-sight microwave systems to carry TDM or IP traffic efficiently and reliably over long distances, while also meeting the needs of enterprise and government customers.

Please address any questions to the undersigned.

Sincerely,

/s/

Tina Pidgeon

Attachments