

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
_____)	

REPLY COMMENTS OF THE ALASKA TELEPHONE ASSOCIATION

Often in our comments to the FCC, we begin by detailing the characteristics that make Alaska unique. And “unique” is one of our more common terms, even as it is accurate. Unfortunately, along with our depictions of expanse – “twice as large as Texas and four times the size of California;” “570,627 square miles” – and discussions of weather conditions, glaciers, tundra, mountains, lack of road access to most communities, “accessible only by water or air or ‘ice roads’ in winter,” and short construction seasons, we generally fail to convey to policymakers (Commissioners and FCC staff) the challenges faced by communications providers in this state. How many policymakers have seen an ice road? How many Commissioners and staff that will be weighing the merits of “universal service reform” have not been to Alaska? We appreciate and are thankful for those that have spent ten, twelve or more hours in those narrow airline seats just to reach Anchorage and then depart for the land we describe as unique, but too many have not been afforded the opportunity or accepted our gracious invitations. And if, as we declare, we truly are unique, then these policymakers cannot comprehend what we are attempting to convey because they have nothing in their experience with which to make a rational comparison.

In our initial comments filed in these dockets, stating most of the aforementioned characteristics, we addressed middle mile costs as a barrier to entry. Distance is always a consideration, but the insular nature of most Alaska communities and current technology dictates that communications access is via satellite. We also suggested a middle mile support mechanism for Tribal Lands which, we believe, this Commission recognizes as having been historically underserved. The attached appendix has been prepared to provide data documenting the small populations, insular (unconnected by roads) nature, and tribal representation of a sampling of Alaska communities. This list is not comprehensive; it is simply representative and we hope it might help us convey to the Commission the status quo.

Respectfully submitted this 11th day of August, 2010.

ALASKA TELEPHONE ASSOCIATION



By: _____
Jim Rowe
Executive Director

Attachment: Alaska Communities: Population, Percentage Native, Road Access and Satellite Only Backhaul

Company	Community	Population*	% Alaska Native or part Native*	Road System	Satellite Backhaul
Adak Telephone Utility	Adak	165	37.30%	no	yes
Arctic Slope Telephone	Anaktuvuk Pass	287	88.30%	no	yes
	Atkasuk	201	94.30%	no	yes
	Barrow	4119	64.00%	no	yes
	Kaktovik	286	84.00%	no	yes
	Nuiqsut	424	89.10%	no	yes
	Pt. Hope	713	90.60%	no	yes
	Pt. Lay	234	88.30%	no	yes
	Wainwright	551	93.00%	no	yes
Bristol Bay Telephone	Ekwok	109	93.80%	no	yes
	Igiugig	64	83.00%	no	yes
	King Salmon	383	30.10%	no	yes
	Naknek	516	47.10%	no	yes
	Koliganek	182	87.40%	no	yes
	Levelock	88	95.10%	no	yes
	New Stuyahok	519	96.00%	no	yes
Bush-Tell, Inc.	Aniak	485	73.30%	no	yes
	Anvik	75	90.40%	no	yes
	Crooked Creek	131	93.40%	no	yes
	Grayling	168	91.80%	no	yes
	Holy Cross	187	96.50%	no	yes
	Lower Kalskag	251	95.50%	no	yes
	Red Devil	44	52.10%	no	yes
	Shageluk	97	96.90%	no	yes
	Sleetmute	71	89.00%	no	yes
	Stony River	48	85.20%	no	yes
	Upper Kalskag	223	90.40%	no	yes
Copper Valley Telephone Cooperative	Chistochina	95	63.40%	yes	no
	Chitina	117	48.80%	yes	no
	Copper Center	297	50.60%	yes	no
	Copperville	131	21.20%	yes	no
	Gakona	202	17.70%	yes	no
	Glennallen	473	12.10%	yes	no
	Gulkana	244	73.90%	yes	no
	Kenny Lake	412	13.40%	yes	no
	Lake Louise	100	10.20%	yes	no
	McCarthy	51	0.00%	yes	yes
	Mendeltma	57	7.90%	yes	no
	Mentasta	120	71.10%	yes	no
	Nelchina	51	9.90%	yes	no
	Silver Springs	198	11.50%	yes	no
	Slana	102	15.30%	yes	no
	Tatitlek	83	85.00%	no	no

*State of Alaska, Alaska Community Database Community Information Summaries, www.commerce.state.ak.us/dca/comddb/CF_CIS.htm, 8/11/2010.

Company	Community	Population*	% Alaska Native or part Native*	Road System	Satellite Backhaul
	Tazlina	207	30.20%	yes	no
	Tolsona	26	14.80%	yes	no
	Tonsina	78	9.80%	yes	no
	Valdez	4498	10.20%	yes	no
Cordova Telephone Cooperative	Cordova	2126	15.00%	no	yes
Ketchikan Public Utilities	City of Ketchikan	7503	22.70%	no	no
	Ketchikan Gateway Borough	5046	3.60%	no	no
	Saxman	435	70.10%	no	no
Matanuska Telephone Association	Big Lake	3331	10.60%	yes	no
	Cantwell	200	27.00%	yes	no
	Clear/Anderson	275	6.50%	yes	no
	Healy	1002	5.30%	yes	no
	Palmer	5532	12.50%	yes	no
	Talkeetna	894	9.10%	yes	no
	Tyonek	166	95.30%	no	no
	Wasilla	7245	9.10%	yes	no
	Willow	2218	6.00%	yes	no
Nushagak Cooperative	Aleknagik	229	84.60%	no	yes
	Clarks Point	61	92.00%	no	yes
	Dillingham	2264	60.90%	no	yes
	Manokotak	438	94.70%	no	yes
OTZ Telephone Coop.	Ambler	261	86.70%	no	yes
	Buckland	432	96.80%	no	yes
	Deering	118	94.10%	no	yes
	Kiana	374	92.80%	no	yes
	Kivalina	410	96.60%	no	yes
	Kobuk	122	93.60%	no	yes
	Kotzebue	3154	76.70%	no	yes
	Noatak	486	96.00%	no	yes
	Noorvik	628	95.00%	no	yes
	Red Dog	35	68.80%	no	yes
	Selawik	849	95.30%	no	yes
	Shungnak	270	94.50%	no	yes
Summit Telephone Co.	Cleary Summit/Chatanika	not listed		yes	no
	Chena Hot Springs	not listed		yes	yes
	Coldfoot	13	0.00%	yes	no
	Wiseman	16	19.00%	yes	no

*State of Alaska, Alaska Community Database Community Information Summaries, www.commerce.state.ak.us/dca/comddb/CF_CIS.htm, 8/11/2010.

Company	Community	Population*	% Alaska Native or part Native*	Road System	Satellite Backhaul
TelAlaska/Interior Telephone	Cold Bay	84	17.00%	no	yes
	Cooper Landing	344	4.90%	yes	yes
	Fort Yukon	585	88.70%	no	yes
	Galena	564	67.40%	no	yes
	Iliamna	91	57.80%	no	yes
	King Cove	744	47.90%	no	yes
	Moose Pass	189	10.70%	yes	no
	Port Lions	200	63.70%	no	yes
	Sand Point	1001	44.20%	no	yes
	Seward	2609	20.90%	yes	no
	Unalaska	3662	9.30%	no	yes
TelAlaska/Mukluk Telephone	Elim	337	94.90%	no	yes
	Golovin	154	92.40%	no	yes
	Koyuk	358	94.30%	no	yes
	L. Diomedes Isle	117	93.80%	no	yes
	Nome	3468	58.70%	no	yes
	St. Michel	446	93.20%	no	yes
	Shaktoolik	231	94.80%	no	yes
	Shishmaref	606	94.50%	no	yes
	Stebbins	605	94.70%	no	yes
	Teller	261	92.50%	no	yes
	Wales	148	90.10%	no	yes
	White Mountain	202	86.20%	no	yes
	United-KUC, Inc.	Bethel	5803	68.00%	no
McGrath		322	54.60%	no	yes
Unalakleet		725	87.70%	no	yes
United Utilities, Inc.	Akiachak	645	96.40%	no	yes
	Akiak	346	95.10%	no	yes
	Alakanuk	686	97.90%	no	yes
	Arctic Village	139	92.10%	no	yes
	Atmautuak	296	95.90%	no	yes
	Beaver	58	95.20%	no	yes
	Birch Creek	31	100.00%	no	yes
	Central	96	9.70%	yes	yes
	Chalkyitsik	60	97.60%	no	yes
	Chefornak	475	98.00%	no	yes
	Chuathbaluk	111	94.10%	no	yes
	Eek	282	96.80%	no	yes
	Emmonak	774	93.90%	no	yes
	Gambell	666	95.80%	no	yes
	Goodnews Bay	237	93.90%	no	yes
	Hooper Bay	1158	95.80%	no	yes

*State of Alaska, Alaska Community Database Community Information Summaries, www.commerce.state.ak.us/dca/comddb/CF_CIS.htm, 8/11/2010.

Company	Community	Population*	% Alaska Native or part Native*	Road System	Satellite Backhaul
	Kasigluk	567	96.70%	no	yes
	Kipnuk	671	98.00%	no	yes
	Kongiganak	465	97.20%	no	yes
	Kotlik	618	96.10%	no	yes
	Kwethluk	764	94.80%	no	yes
	Kwigillingok	365	97.90%	no	yes
	Lake Minchumina	17	12.50%	no	yes
	Lime Village	19	0.00%	no	yes
	Livengood	24	13.80%	yes	yes
	Manley Hot Springs	81	23.60%	yes	yes
	Marshall	414	97.70%	no	yes
	Mekoryuk	174	96.70%	no	yes
	Minto	191	92.20%	yes	yes
	Mountain Village	782	93.50%	no	yes
	Napakiak	337	96.60%	no	yes
	Napaskiat	428	98.20%	no	yes
	Newtok	355	96.90%	no	yes
	Nightmute	264	94.70%	no	yes
	Nikolai	87	81.00%	no	yes
	Numan Iqua	193	93.90%	no	yes
	Nunapitchuk	539	95.90%	no	yes
	Oscarville	109	100.00%	no	yes
	Pilot Station	577	97.60%	no	yes
	Platinum	57	92.70%	no	yes
	Quinhagak	680	97.30%	no	yes
	Rampart	12	91.10%	no	yes
	Russian Mission	363	93.90%	no	yes
	Saint Mary's	553	87.60%	no	yes
	Savoonga	721	95.50%	no	yes
	Scammon Bay	528	97.40%	no	yes
	Stevens Village	64	95.40%	no	yes
	Takotna	53	42.00%	no	yes
	Togiak	820	92.70%	no	yes
	Toksook Bay	596	97.60%	no	yes
	Tuluksak	471	94.20%	no	yes
	Tuntutuliak	384	98.90%	no	yes
	Tununak	330	96.90%	no	yes
	Twin Hills	74	94.20%	no	yes
	Venetie	185	96.50%	no	yes
Yukon Telephone Co.	Ruby	149	86.20%	no	yes
	Tanana	251	81.50%	no	yes
	Whittier	159	12.60%	yes	no

*State of Alaska, Alaska Community Database Community Information Summaries, www.commerce.state.ak.us/dca/commdb/CF_CIS.htm, 8/11/2010.