



March 18, 2011

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VIA ELECTRONIC FILING

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

Re: *Empowering Consumers to Avoid Bill Shock, CG Docket 10-207
Notice of Oral Ex Parte*

Dear Ms. Dortch:

On March 17, at the request of Commission staff, undersigned spoke via telephone with John Adams and Lynn Ratnavale of the Consumer and Governmental Affairs Bureau to discuss GCI's automatic alerts for wireless service plan overages.

GCI developed and implemented an automated threshold notification system in October 2009. The system is designed to automatically alert customers of most residential and Lifeline mobile phone plans with voice usage limits when they approach, meet, or exceed their service plan usage. Customers do not have to opt-in to this service. GCI currently monitors several usage types, including plan minutes, long distance usage, roaming, international usage, and data usage. Generally, GCI sends notifications in the form of text messages and automated calls, and in many cases will automatically suspend usage to prevent extreme overages.

More specifically, GCI sends text alerts when a mobile phone customer reaches 80%, 100%, and 120% of their included plan minutes or when the customer has reached a predetermined dollar amount specific for a specific type of usage. Automated calls are typically made when a customer reaches 150% of their plan minutes or have reached a predetermined dollar amount for a specific type of usage. Mobile phone usage is usually suspended when a customer reaches 300% of their wireless plan minutes or a predetermined dollar amount for a specific type of usage.

For GCI's mobile broadband services (PC air card or MiFi device), GCI typically sends automatic emails (as well as texts to mobile broadband customers with a wireless phone on the same account) when a customer reaches 80%, 100%, and 120% of plan usage, and will automatically suspend the service at approximately \$200 over the usage amount.

Marlene H. Dortch

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In general, automated alerts are sent between 9am and 8:30pm, and usage is calculated every 30–60 minutes. Customers are usually alerted within one hour of reaching a threshold, except in the case of international or domestic roaming usage, which depends on records from GCI's roaming partners and can be delayed by 30 days or more.

GCI also offers several “pay as you go” wireless plans to limit unanticipated charges.

GCI does not yet provide threshold alerts on unlimited wireless plans, but expects to do so in the future. GCI cannot currently guarantee notification to all customers at all times, but is looking at ways to improve its threshold alerting systems.

Please contact the undersigned with questions.

Sincerely,

/s/

Christopher Nierman
Director, Federal Regulatory Affairs

cc: John Adams
Lynn Ratnavale