

May 13, 2011

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

Re: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Federal State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link Up*, WC Docket No. 03-109

Dear Ms. Dortch:

On May 12, 2011, Chris Nierman of General Communication, Inc. (“GCI”), and Jacinda Lanum and I, on behalf of GCI, met with the following FCC staff: Kim Scardino, Cindy Spiers, Jonathan Lechter, Robert Finley, and Jamie Susskind, all of the Wireline Competition Bureau.

The participants discussed various aspects of GCI’s business and its Lifeline program in particular. GCI provides Lifeline services and receives Lifeline support for Lifeline services provided by its ILEC, wireline CETC, and wireless CETC affiliates. GCI offers Lifeline service in very remote areas of Alaska and has been deploying the first wireless services in many parts of rural Alaska – for the first time giving consumers, including low-income consumers, the ability to make emergency calls from beyond their homes. This deployment provides real world public safety benefits for Alaskans of all income levels, who can now summon assistance, for example, if their snow machine breaks down away from the local village. Lifeline helps ensure that low-income Alaskans are not left without access to this potentially life-saving communications link. GCI does not presently seek or receive Link Up support for either its CETC wireline or wireless low-income services. GCI’s ILEC affiliates United Utilities and United-KUC do receive Link Up support.

The FCC staff also asked about GCI’s process for handling duplicate Lifeline accounts held by a single customer. When GCI’s Lifeline Compliance Team discovers duplicate Lifeline accounts, it suspends both accounts, which removes both lines from GCI’s Lifeline subscriber line counts. The Lifeline Compliance Team also sends a cover letter and a re-certification letter to the customer, reminding the customer that he or she can have only one Lifeline account and must choose one of the two accounts on which to re-start service. Additionally, the Lifeline Compliance Team notifies GCI’s Senior Manager for Finance and Administration to make a retroactive line count adjustment for the period during which the customer had two Lifeline accounts.

The participants also discussed certain policy issues and proposals contained in the Lifeline NPRM, including the proposal to require customers to provide documentation of program participation in order to qualify for Lifeline; GCI's proposal to differentiate between excluding no-use lines for prepaid and no-pay lines for post-paid customers; the lack of a need for pro rata reporting of partial month subscribers; the scope and objectives for a national Lifeline database, and whether it could be a networked system of databases; an interim process for resolving duplicates; and a one-per-nuclear-family limitation on Lifeline support. GCI has previously described its position on these topics in various filings at the Commission.

If you require any additional information please contact the undersigned.

Sincerely,



John T. Nakahata
Counsel to General Communication, Inc.

cc:

Kim Scardino
Cindy Spiers
Jonathan Lechter
Robert Finley
Jamie Susskind