

June 15, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 behalf of General Communication, Inc. ("GCI"), on June 13, 2011, I spoke with Zachary Katz, Legal Advisor to the Chairman and Margaret McCarthy, Legal Adviser to Commissioner Copps. On June 14, 2011, I also spoke with Kimberly Scardino of the Wireline Competition Bureau. In these conversations, we discussed some or all of the points summarized below.

GCI has not yet finalized its plans for how to handle customers identified as potential duplicates, as it understands that Alaska is not one of the first two states in which the duplicate resolution process will be run. Nonetheless, GCI anticipates attempting to reach out to its customers that are identified as potential subscribers to duplicative Lifeline services, to ensure that the subscribers know what they would need to do to retain GCI Lifeline service and the consequences of not retaining GCI Lifeline services. Of course, given the often-transient nature of low income subscribers, GCI may not be able actually to reach all customers that are identified as receiving duplicative services. It is also likely that GCI, as it does today, will employ "hotlining" -- when a consumer can only call customer service and 911 -- in order to determine whether a customer seeks to continue receiving GCI service at a non-discounted rate or to terminate service. However, if GCI cannot reach a customer and the customer fails to call back in response, it will terminate that customer's service. These plans are preliminary and are subject to change as GCI learns more about consumer reaction to these duplicate resolution processes. In addition, as a small carrier, it would be very difficult for GCI to change its practices solely for any Lifeline "duplicates" resolution process.

A copy of this letter is being filed in the above-referenced dockets.

Sincerely,



John T. Nakahata  
*Counsel to General Communication, Inc.*

cc: Zachary Katz  
Margaret McCarthy  
Trent Harkrader  
Kimberly Scardino