



August 26, 2011

VIA ELECTRONIC FILING

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

Re: *Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Inter-carrier Compensation Regime, CC Docket No. -01-92; 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 August 24, Anand Vadapalli, Leonard Steinberg, and Amy Gardner of Alaska Communications ("ACS") met with Federal Communications Commission ("FCC") Chairman Julius Genachowski, Gregory Guice, Office of Legislative Affairs, FCC, and Meagan Foster, Legislative Assistant, Office of Senator Mark Begich. They met in Anchorage, Alaska to discuss the special needs of the Alaskan telecommunications market and the necessity of universal service funding to achieve national broadband goals in Alaska. Attached is a copy of the materials presented in that meeting.

ACS discussed efforts that the company has made to achieve a combined wireless and wire line network capable of delivering data and voice to much of the high cost and isolated communities of Alaska. ACS explained how that effort has required the existing Universal Service Fund ("USF") mechanisms for the build out and the continued operating costs where middle mile terrestrial facilities are limited or nonexistent.

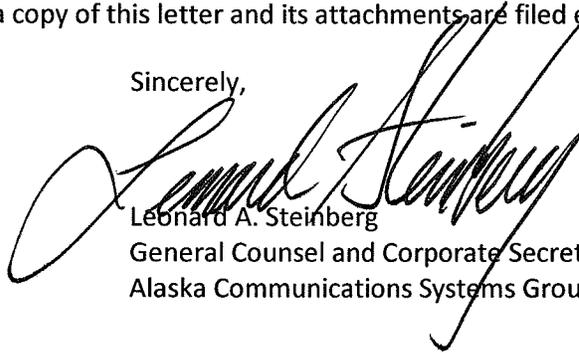
ACS provided information on how the current national USF reform proposals do not work for Alaska. The ABC plan is unlikely to promote broadband in Alaska and may actually reduce existing voice services in rural Alaska. The Alaskan providers have engaged in significant dialog since the FCC's Public Notice; ACS and GCI developed a basic consensus framework on a proposal for Alaska. ACS's plan for a Target Alaska Fund and access charge reform does differ in some important respects from GCI's Alaska Broadband Plan. The TAF freezes USF at 2010 levels. Dialogue continues with the other providers in the state. ACS discussed access charges reform in Alaska. Alaska end-users already pay \$25-\$30 per month

for basic phone service when all fees and charges are included. ACS discussed how further reductions in access charges benefit only the largest carriers terminating traffic in Alaska.

Regarding wireless consolidation, ACS discussed how this consolidation threatens smaller providers such as itself and is an impediment to 4G broadband deployment. ACS anticipates handset availability and data roaming agreements to make its 4G deployment more difficult.

Pursuant to the FCC's Rules, a copy of this letter and its attachments are filed electronically.

Sincerely,

A handwritten signature in black ink, appearing to read "Leonard A. Steinberg". The signature is fluid and cursive, with a large initial "L" and "A".

Leonard A. Steinberg
General Counsel and Corporate Secretary
Alaska Communications Systems Group, Inc.

Cc: Meeting Participants