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September 9, 2011

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: *Developing a Unified Intercarrier Compensation Regime, et al.*,  
CC Docket Nos. 01-92 and 96-45, WC Docket Nos. 03-109, 05-  
337, 07-135 and 10-90, and GN Docket No. 09- 51 –  
*Ex Parte Notice*

Dear Ms. Dortch:

On September 7, 2011, Leonard Steinberg of Alaska Communications Systems Group, Inc., on behalf of its operating subsidiaries (“ACS”), Tom Meade, a consultant to ACS, and I met with Margaret McCarthy of the Office Commissioner Cops, and with Carol Matthey, Victoria Goldberg, Al Lewis, Amy Bender, Joe Cavender and Kevin King, all of the Wireline Competition Bureau, concerning the FCC’s pending rulemaking in the above-captioned dockets. On September 8, 2011, Mssrs. Steinberg and Meade and I met with the following concerning the same topic: Commissioner McDowell and Christine Kurth, Angie Kronenberg of the Office of Commission Clyburn, Zac Katz of the Chairman’s office, and Sharon Gillett and Joe Cavender of the Wireline Competition Bureau.

In these meetings, ACS explained that the Alaska-based service providers have diligently worked to develop a compromise proposal for universal service reform that will give customers in Alaska access to advanced telecommunications and information services that are reasonably comparable, and comparably priced, to those available in the rest of the nation. ACS touched upon some of the challenges of serving remote, isolated communities in Alaska, including the very high per-customer costs of deploying both fixed and mobile networks. ACS noted that federal universal service funding has been instrumental to the ability of Alaska’s service providers to deliver essential fixed and mobile services to many customers in the state who simply would not have access to those services in the absence of this type of support. Thus, ACS believes that current programs have been successful in improving the availability and affordability of services in Alaska,

though the state remains underserved by many measures, and more work remains to be done to bring the state into the broadband age.

ACS highlighted the access charge reforms already undertaken in Alaska, and the impact of those reforms on end-user rates. Both ACS and the Regulatory Commission of Alaska have filed comments in these proceedings documenting that local end-user rates already exceed \$25 per line per month, and in many study areas in the state exceed \$30 per line per month. ACS urged that Alaska consumers be spared additional rate increases in the coming years. ACS also observed that the chief beneficiaries of intrastate access charge reductions have been AT&T and GCI, and that the chief beneficiaries of reductions in interstate access charges would be the two largest national carriers, AT&T and Verizon – not Alaska consumers.

ACS emphasized that unique circumstances in the state justify special rules for universal service funding, Connect America Funding, and inter-carrier compensation. ACS then summarized the Alaska-specific proposals that it set forth in its comments filed August 24, 2011 in the above-captioned dockets, and which are summarized in the attached materials, which were distributed at these meetings. ACS pledged to continue working with all of the affected stakeholders in Alaska to find reasonable solutions that will accomplish the goals of the Communications Act in the state.

Please direct any questions regarding this matter to me.

Very truly yours,

/s/  
Karen Brinkmann  
*Counsel to ACS*

Enclosure

cc:

Amy Bender  
Joseph Cavender  
Sharon Gillett  
Victoria Goldberg  
Zachary Katz  
Kevin King  
Angela Kronenberg  
Christine Kurth  
Al Lewis  
Carol Matthey  
Margaret McCarthy  
Robert McDowell