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October 21, 2011

**Ex Parte Communication**

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

Re: *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *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 Wednesday, October 19, 2011, representatives of the Alaska Rural Coalition (ARC) discussed matters related to the above-referenced proceedings with Michael Steffen, Special Counsel representing the Chairman's Office and Brad Gillen from the Wireline Competition Bureau. Participants included including Michael Burke, Burke Watson, Inc. and Kenneth Bahr, Regulatory Manager of Matanuska Telephone Association and I. On Thursday, October 20, 2011, the same participants met with Ms. Christine Kurth from Commissioner McDowell's Office.

We discussed the potential impacts of the Commission's reform efforts on RLECs in Alaska and the need for a safety net. The ARC continues to believe that responsible Universal Service reform favors a safety net for rural ILECs and recovery of legacy investment over a continuation of identical support, particularly when that support is not dependent on a showing of actual cost.

GCI's ex parte of October 18, 2011 suggests that GCI's Alaska Plan represents the substantial agreement of all Alaska carriers.<sup>1</sup> We disagree with GCI's assertion as the ARC has separately articulated its position in its Comments and Reply Comments. The ARC supports the elimination of identical support and a cost-based system for allocation of high cost support.

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<sup>1</sup> GCI Ex Parte Letter by John Nakahata on October 18, 2011 at 1.

Marlene H. Dortch  
October 21, 2011  
Page 2

If you have any questions or I may be of assistance, please do not hesitate to contact me.

Sincerely,

/s/\_\_\_\_\_

Shannon M. Heim

cc: Michael Steffen  
Brad Gillen  
Christine Kurth