



October 21, 2011

Ex Parte Notice – Exempt from Sunshine Prohibition Pursuant to 47 CFR § 1.1203(a)(1), 1.1204(a)(10)

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
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 an Unified Intercarrier 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 October 21, 2011, at approximately 6:15 pm, on behalf of General Communication, Inc., I spoke with Margaret McCarthy, Legal Adviser to Commissioner Copps. On the same day, at approximately 6:30 pm, I spoke with Edward Lazarus, Chief of Staff to the Chairman, and Zachary Katz, Chief Counsel and Senior Legal Adviser to the Chairman. In both calls, I presented points already summarized in the record in my ex parte letter from earlier today, regarding my earlier conversations with Messrs. Lazarus and Katz, among others. That letter is incorporated by reference herein. In both calls, I stated that the likely effect only a two year delay in the start of any phase out of CETC support in rural Alaska, would be to suspend planned deployments of 2G wireless services in 52 villages, 49 of which are currently unserved by any wireless carrier. While that phase out may eventually be superceded by the creation of, and transition to, a Mobility Fund 2 to be proposed in a Further Notice of Proposed Rulemaking, a company could not rely on the availability of such support in making its investment decisions prior to that mechanism being defined with specificity. This is especially true if accompanied by a cap on CETC support in a given study area, as a carrier that initiated new service would be unlikely to receive revenue beyond end user revenue for doing so. I observed that while a delay in the start of a phase out accompanied by such a cap could help prevent discontinuance of existing services, it was unlikely to lead to new deployments of unserved areas. I also observed

Ms. Marlene H. Dortch

October 21, 2011

Page 2 of 2

that it would not be surprising for the Commission to require more than two years to establish the rules, and then to implement the selection procedures (such as a reverse auction) for a Mobile Fund 2.

Sincerely,

/s/

John T. Nakahata

Counsel to General Communication, Inc.

cc: Edward Lazarus
Zachary Katz
Margaret McCarthy