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March 14, 2012

**EX PARTE COMMUNICATION
VIA ELECTRONIC FILING**

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

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

Dear Ms. Dortch:

On March 9, 2012, on behalf of the Alaska Rural Coalition ("ARC") and its members¹, Christine O'Connor of Matanuska Telephone Association, Michael Garrett of Alaska Power and Telephone, Michael Burke of Burke Watson and I met with Chairman Genachowski's Legal Advisor Michael Steffen, Competition Policy Division Deputy Division Chief Amy Bender and Competition Policy Division Senior Attorney Ted Burmeister from the Wireline Competition Bureau on March 9, 2012. We also met separately with Commissioner Clyburn's Legal Advisor, Angela Kronenberg.

On March 10, 2012, Michael Burke and I met with Commission McDowell's Wireline Counselor, Christine Kurth. At each of our meetings we discussed issues raised in the ARC's Petition for Reconsideration. We offer this ex parte as a description of what we discussed and to supplement our discussion.

¹ The ARC is composed of Adak Eagle Enterprises LLC, Arctic Slope Telephone Association Cooperative, Inc., Bettles Telephone, Inc., Bristol Bay Telephone Cooperative, Inc., Bush-Tell, Inc., Circle Telephone & Electric, LLC, Cordova Telephone Cooperative, Inc., Copper Valley Telephone Cooperative, Inc., City of Ketchikan, Ketchikan Public Utilities, Matanuska Telephone Association, Inc., OTZ Telephone Cooperative, Inc., Interior Telephone Company, Mukluk Telephone Company, Inc., Alaska Telephone Company, North Country Telephone Inc., Nushagak Electric and Telephone Company, Inc., The Summit Telephone and Telegraph Company, Inc., and Yukon Telephone Company, Inc.

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Alaska ETC Should Receive A Two Year Delay in CAF Implementation.

The Commission provided a slower transition path for CETCs serving remote Alaska to promote continued investment and provide stability to the market.² The Commission's justification for providing a two year delay for CETCs is equally applicable to all ETCs that serve remote Alaska locations. The ARC asked the Commission to reconsider whether or not to treat CETCs and ETCs differently in Alaska given that the companies face the same challenges and would likewise benefit from a delay in the transition process.³ Specifically, the ARC seeks a delay in the limitation on corporate operations expenses, the cap of corporate operations on ICLS, the application of a regression analysis to cap loop costs and the elimination of the safety net additive.⁴

The Commission's accommodation to the CETCs is a frozen amount of support in the remote areas of Alaska based on the ILEC ETC's costs for the next two years. It seems incongruous that the CETCs should continue to receive the full portion of high cost support in areas where they have made no showing of actual costs, but the ETCs who have fully complied with all Commission rules and demonstrated their costs should take a cut in support at the same time that the Commission anticipates these ETCs needing to make further investment to provide broadband services. The ARC understands the Commission's reasoning for providing a slower transition for CETCs in Alaska, but the lack of parity between carriers in the same remote Alaska markets does not make any sense.

Extending the two year delay in implementation to all Alaska ETCs in remote areas would help relieve the financial burden of complying with the *Transformation Order*, including utilizing the waiver process. The *Transformation Order* decreased the ability of small, rural companies, many investor-owned, to recover capital and operating costs at a time that those costs are increasing and new investment is needed. To comply with the broadband obligations and goals established by the Commission, all companies in Alaska will need to consider significant investment in updated network infrastructure and purchasing access to expensive middle mile facilities. Maintaining a consistent, predictable and sufficient amount of loop support is a critical step to promoting that investment.

The ARC appreciates that the Commission is sensitive to any additional costs, but the two year delay sought by the ARC has a de minimus impact on the capped fund. The

² *Transformation Order* at para. 529.

³ ARC Petition for Reconsideration at 7-8.

⁴ There was some discussion of the safety net additive not being subject to the two year delay in the same manner that other ETC cuts may be. The ARC continues to believe the safety net additive should be phased out more slowly, especially in light of CETCs continuing to receive that funding based on frozen support for the remote areas of Alaska.

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companies continue to work on itemizing the expense.⁵ GCI has advocated retaining the universal service support once received by Dobson to Alaska.⁶ The ARC believes allocating the Dobson funds to pay for the two year delay for all ETCs in remote areas of Alaska would remove any additional pressure, although minute, on the CAF. We noted that no party has expressed opposition to extending this two year delay to all ETCs serving the remote areas of Alaska.

CETCs Should Comply With Applicable Rule Changes During Two Year Transition and Eventual Phase Down of Identical Support.

The ARC discussed the concerns about how the rule changes articulated in the *Transformation Order* will apply to CETCs in Alaska. The ARC Petition for Reconsideration sought clarification that all CETCs must comply with the new rules, particularly the requirement that local rates should not fall below the national urban rate.⁷ The ARC believes that companies receiving high cost support, in any form, should be required to comply with the Commission's rules. We discussed the competitive implications for the market if one carrier is unrestricted regarding the local rate.

Cost of Middle Mile Must Factor Into Commission's Broadband Benchmarks.

During our meeting, there was a difference of opinion whether or not the cost of terrestrial middle mile access factored into whether or not an ETC is required to purchase it to provide the 4 Mbps downstream and 1 Mbps upstream. The ARC Petition for Reconsideration asked for reconsideration of the apparent requirement that cost of terrestrial middle mile cannot factor into the obligation to purchase it to meet the broadband benchmark.⁸ We've attached the GCI tariffed rates for terrestrial and satellite middle mile facilities to supplement the argument we presented in our Petition for Reconsideration.⁹ These rates are many times the cost of similar services elsewhere in the country and clearly demonstrate the problem of securing affordable middle mile confronting ETCs serving Remote Alaska.

⁵ Freezing the safety net additive would provide vital cost recovery for investments already made to critical network infrastructure. Based on publicly available USAC data, we estimate freezing the safety net additive would keep an additional \$889,830 in Alaska.

⁶ See GCI Ex Parte on Dec. 12, 2011 and GCI Petition for Reconsideration at 10-11.

⁷ See *Transformation Order* at para. 235.

⁸ See ARC Petition for Reconsideration at 11-12; *Transformation Order* at para. 162.

⁹ See GCI's Private Line Tariff, attached. <http://assets.gci.com/tariffs/1544mbpst1speed.pdf> (visited Mar. 14, 2012).

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The *Transformation Order* does contain greater flexibility for rate-of-return carriers in meeting the broadband public interest obligations.¹⁰ “[Carriers that continue to receive HCLS or ICLS] must provide broadband service at speeds of at least 4 Mbps downstream and 1 Mbps upstream with latency suitable for real-time applications, such as VoIP, and with usage capacity reasonably comparable to that available in residential terrestrial fixed broadband offerings in urban areas, upon reasonable request.”¹¹

The relationship between the greater flexibility contained in paragraph 206 and the requirement that those with access to terrestrial middle mile must purchase it contained in paragraph 101 and footnote 162 remains unclear and would benefit from clarification. If the cost of purchasing terrestrial middle mile service exceeds the high cost support available to support it, does that make a request for the service unreasonable? Does that requirement apply only to rate-of-return carriers? Alaska Communications Systems, a price cap carrier, has expressed a similar difficulty in purchasing access to terrestrial middle service on the TERRA-SW Project.¹²

The ARC respectfully requests a clarification that cost is a factor in determining whether a rate-of-return carrier must purchase access to terrestrial broadband. The ARC continues to support a broader reconsideration of footnote 162 to allow all carriers to factor in the cost of middle mile into the requirement to purchase it and meet the public interest obligations for broadband.

Alaska Needs a Streamlined Waiver Process.

The ARC urged the Commission to establish a streamlined process, including firm deadlines, for waiver petitions filed by Alaska carriers. We discussed the “shot clock” for waiver petitions for carriers serving tribal lands and insular areas.¹³ The ARC had not taken the provisions of paragraph 544 to trigger a shot clock, but if the Commission intends to resolve tribal waiver petitions within 45 days of the record closing on a waiver petition, the time concern of the ARC may be addressed.

The second issue regarding waiver petitions was the standard of harm required by the Commission to achieve a waiver. “[A] carrier seeking such waiver must demonstrate that it needs additional support in order for its customers to continue receiving voice service in areas where there is no terrestrial alternative.”¹⁴ We discussed the difficulty for small companies to present the volume of detailed evidence the Commission requires to demonstrate that

¹⁰ See *Transformation Order* at para. 206.

¹¹ See *Transformation Order* at para. 206 (emphasis added).

¹² See *ACS Comments on Petitions for Reconsideration* at 5 n.8.

¹³ See *Transformation Order* at para. 544.

¹⁴ See *Transformation Order* at para. 540.

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customers may lose their voice service. The ARC urges the Commission to consider a standard that can be extrapolated in time to allow carriers to address their concerns before financial ruin is imminent.

We appreciate the opportunity to provide the Commission a full picture of the Alaska landscape. We believe that the goals of the Commission's USF reform must be balanced with the unique needs of underserved Alaskans.

Sincerely,

/s/
Shannon M. Heim

cc: Michael Steffen
Amy Bender
Ted Burmeister
Angela Kronenberg
Christine Kurth

1.544 Mbps RATES

Description

GCI Private Line service provides data service between specific points suitable for use in any manner compatible with the channel's technical characteristics.

Local Exchange Facilities

Local Exchange Facilities for terminating GCI Digital Private Line Service will be obtained from the appropriate exchange carrier at its tariffed rate.

Rates and Charges

Rates quoted below are monthly recurring charges (7 days/Week, 24 hrs/day), do not include local channel access charges, and apply to each section of an Interexchange channel, i.e.; between each pair of points, on all types of channels.

Installation Charge:

\$200

Monthly Rates:

The pricing chart refers to "DAMA Villages". Please see, below the chart, the listing of cities considered "DAMA Villages".

**1.544
Mbps**

BETWEEN			Month to Month
Anchorage	Barrow	Satellite	14,447.00
Anchorage	Bethel	Satellite	14,447.00
Anchorage	DAMA Villages	Satellite	14,447.00
Anchorage	Dillingham	Satellite	14,447.00
Anchorage	Dutch Harbor	Satellite	14,447.00
Anchorage	King Salmon	Satellite	14,447.00
Anchorage	Kodiak	Satellite	14,447.00
Anchorage	Kotzebue	Satellite	14,447.00
Anchorage	Nome	Satellite	14,447.00
Anchorage	Delta Jct.	Terrestrial	4,159.00
Anchorage	Eagle River	Terrestrial	608.40
Anchorage	Fairbanks	Terrestrial	5,655.00
Anchorage	Glennallen	Terrestrial	3,729.00
Anchorage	Homer	Terrestrial Terrestrial	5,075.00
Anchorage	Juneau	Terrestrial	6,285.00
Anchorage	Kenai	Terrestrial	2,900.00
Anchorage	Ketchikan	Terrestrial Terrestrial	16,785.00
Anchorage	Palmer	Terrestrial Terrestrial	908.00
Anchorage	Prudhoe Bay	Terrestrial	6,525.00
Anchorage	Seattle	Terrestrial	12,999.00
Anchorage	Seward	Terrestrial	3,515.00

Anchorage	Sitka	Terrestrial	Terrestrial	10,548.00
Anchorage	Valdez	Terrestrial		2,839.00
Anchorage	Wasilla	Terrestrial		908.00
Anchorage	Whittier	Terrestrial		2,339.00

Barrow	Bethel	Satellite		14,447.00
Barrow	Cordova	Satellite		14,447.00
Barrow	Dillingham	Satellite		14,447.00
Barrow	Dutch Harbor	Satellite		14,447.00
Barrow	Eagle River	Satellite		14,447.00
Barrow	Fairbanks	Satellite		14,447.00
Barrow	Juneau	Satellite		14,447.00
Barrow	King Salmon	Satellite		14,447.00
Barrow	Kotzebue	Satellite		14,447.00
Barrow	Nome	Satellite		14,447.00
Barrow	Prudhoe Bay	Satellite		14,447.00
Barrow	Seattle	Satellite		14,447.00
Barrow	DAMA Villages	Satellite		14,447.00

Bethel	Barrow	Satellite		14,447.00
Bethel	Cordova	Satellite		14,447.00
Bethel	Dillingham	Satellite		14,447.00
Bethel	Dutch Harbor	Satellite		14,447.00
Bethel	Eagle River	Satellite		14,447.00
Bethel	Fairbanks	Satellite		14,447.00
Bethel	Juneau	Satellite		14,447.00
Bethel	King Salmon	Satellite		14,447.00
Bethel	Kodiak	Satellite		14,447.00
Bethel	Kotzebue	Satellite		14,447.00
Bethel	Nome	Satellite		14,447.00
Bethel	Prudhoe Bay	Satellite		14,447.00
Bethel	Seattle	Satellite		14,447.00
Bethel	DAMA Villages	Satellite		14,447.00

Coldfoot	Prudhoe Bay	Terrestrial		1,500.00
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Cordova	Barrow	Satellite		14,447.00
Cordova	Bethel	Satellite		14,447.00
Cordova	Dutch Harbor	Satellite		14,447.00
Cordova	Eagle River	Satellite		14,447.00
Cordova	Fairbanks	Satellite		14,447.00
Cordova	Juneau	Satellite		14,447.00
Cordova	Seattle	Satellite		14,447.00
Cordova	Seward	Satellite		14,447.00
Cordova	Sitka	Satellite		14,447.00
Cordova	Skagway	Satellite		14,447.00
Cordova	Talkeetna	Satellite		14,447.00
Cordova	Valdez	Satellite		14,447.00
Cordova	DAMA Villages	Satellite		14,447.00

Delta Jct	Fairbanks	Terrestrial		1,800.00
Delta Jct	Glennallen	Terrestrial		2,250.00
Delta Jct	Juneau	Terrestrial		10,444.00
Delta Jct	Kenai	Terrestrial	Terrestrial	7,059.00
Delta Jct	Valdez	Terrestrial		2,497.00

Dillingham	Barrow	Satellite		14,447.00
Dillingham	Bethel	Satellite		14,447.00
Dillingham	Cordova	Satellite		14,447.00
Dillingham	Dutch Harbor	Satellite		14,447.00
Dillingham	Fairbanks	Satellite		14,447.00
Dillingham	Juneau	Satellite		14,447.00
Dillingham	Ketchikan	Satellite		14,447.00
Dillingham	King Salmon	Satellite		14,447.00
Dillingham	Kodiak	Satellite		14,447.00
Dillingham	Kotzebue	Satellite		14,447.00
Dillingham	Nome	Satellite		14,447.00
Dillingham	Seattle	Satellite		14,447.00
Dillingham	DAMA Villages	Satellite		14,447.00

Dutch Harbor	Barrow	Satellite		14,447.00
Dutch Harbor	Bethel	Satellite		14,447.00
Dutch Harbor	Coldfoot	Satellite		14,447.00
Dutch Harbor	Cordova	Satellite		14,447.00
Dutch Harbor	Dillingham	Satellite		14,447.00
Dutch Harbor	Fairbanks	Satellite		14,447.00
Dutch Harbor	Juneau	Satellite		14,447.00
Dutch Harbor	King Salmon	Satellite		14,447.00
Dutch Harbor	Kodiak	Satellite		14,447.00
Dutch Harbor	Kotzebue	Satellite		14,447.00
Dutch Harbor	Nome	Satellite		14,447.00
Dutch Harbor	Seattle	Satellite		14,447.00
Dutch Harbor	DAMA Villages	Satellite		14,447.00
Dutch Harbor	Barrow	Satellite		14,447.00
Dutch Harbor	Bethel	Satellite		14,447.00

Eagle River	Cordova	Satellite		14,447.00
Eagle River	DAMA Villages	Satellite		14,447.00
Eagle River	Dillingham	Satellite		14,447.00
Eagle River	Dutch Harbor	Satellite		14,447.00
Eagle River	Ketchikan	Satellite		14,447.00
Eagle River	King Salmon	Satellite		14,447.00
Eagle River	Kodiak	Satellite		14,447.00
Eagle River	Kotzebue	Satellite		14,447.00
Eagle River	Nome	Satellite		14,447.00
Eagle River	Delta Jct.	Terrestrial	Terrestrial	4,848.00
Eagle River	Fairbanks	Terrestrial	Terrestrial	6,344.00
Eagle River	Glennallen	Terrestrial	Terrestrial	4,418.00
Eagle River	Juneau	Terrestrial	Terrestrial	6,974.00

Eagle River	Kenai	Terrestrial	Terrestrial	3,589.00
Eagle River	Prudhoe Bay	Terrestrial	Terrestrial	7,214.00
Eagle River	Seward	Terrestrial		4,451.00
Eagle River	Valdez	Terrestrial	Terrestrial	3,528.00
Eagle River	Whittier	Terrestrial	Terrestrial	3,028.00
Eagle River	Seattle	Terrestrial	Terrestrial	13,688.00

Fairbanks	Barrow	Satellite		14,447.00
Fairbanks	Bethel	Satellite		14,447.00
Fairbanks	Cordova	Satellite		14,447.00
Fairbanks	DAMA Villages	Satellite		14,447.00
Fairbanks	Ketchikan	Satellite		14,447.00
Fairbanks	King Salmon	Satellite		14,447.00
Fairbanks	Kodiak	Satellite		14,447.00
Fairbanks	Kotzebue	Satellite		14,447.00
Fairbanks	Nome	Satellite		14,447.00
Fairbanks	Delta Jct.	Terrestrial		1,800.00
Fairbanks	Glennallen	Terrestrial		2,959.00
Fairbanks	Juneau	Terrestrial		11,500.00
Fairbanks	Kenai	Terrestrial	Terrestrial	8,555.00
Fairbanks	Prudhoe Bay	Terrestrial		4,500.00
Fairbanks	Seattle	Terrestrial		14,499.00
Fairbanks	Valdez	Terrestrial		4,279.00

Glennallen	Delta Jct.	Terrestrial		2,250.00
Glennallen	Fairbanks	Terrestrial		2,959.00
Glennallen	Juneau	Terrestrial		10,014.00
Glennallen	Kenai	Terrestrial	Terrestrial	6,629.00
Glennallen	Prudhoe Bay	Terrestrial		5,519.00
Glennallen	Seattle	Terrestrial		16,728.00
Glennallen	Valdez	Terrestrial		2,250.00
Glennallen	DAMA Villages	Terrestrial	Satellite	17,726.00

Homer	Cordova	Terrestrial	Satellite	19,522.00
Homer	Delta Jct.	Terrestrial	Terrestrial	9,234.00
Homer	Dillingham	Terrestrial	Satellite	19,522.00
Homer	Dutch Harbor	Terrestrial	Satellite	19,522.00
Homer	Eagle River	Terrestrial		6,011.00
Homer	Fairbanks	Terrestrial	Terrestrial	10,730.00
Homer	Glennallen	Terrestrial	Terrestrial	8,804.00
Homer	Juneau	Terrestrial	Terrestrial	11,900.00
Homer	Kenai	Terrestrial		2,175.00
Homer	Ketchikan	Terrestrial	Satellite	19,522.00
Homer	King Salmon	Terrestrial	Satellite	19,522.00
Homer	Kodiak	Terrestrial	Satellite	19,522.00
Homer	Prudhoe Bay	Terrestrial	Terrestrial	11,600.00
Homer	Seattle	Terrestrial	Terrestrial	18,074.00
Homer	Whittier	Terrestrial	Terrestrial	7,414.00

Juneau	Barrow	Satellite		14,447.00
Juneau	Bethel	Satellite		14,447.00
Juneau	Cordova	Satellite		14,447.00
Juneau	DAMA Villages	Satellite		14,447.00
Juneau	Dillingham	Satellite		14,447.00
Juneau	Dutch Harbor	Satellite		14,447.00
Juneau	King Salmon	Satellite		14,447.00
Juneau	Kodiak	Satellite		14,447.00
Juneau	Kotzebue	Satellite		14,447.00
Juneau	Nome	Satellite		14,447.00
Juneau	Delta Jct.	Terrestrial	Terrestrial	10,984.00
Juneau	Eagle River	Terrestrial	Terrestrial	7,221.00
Juneau	Fairbanks	Terrestrial		11,500.00
Juneau	Glennallen	Terrestrial		10,014.00
Juneau	Homer	Terrestrial	Terrestrial	11,910.00
Juneau	Kenai	Terrestrial	Terrestrial	9,185.00
Juneau	Ketchikan	Terrestrial		10,500.00
Juneau	Petersburg	Terrestrial		5,999.00
Juneau	Prudhoe Bay	Terrestrial		12,810.00
Juneau	Seattle	Terrestrial		12,375.00
Juneau	Seward	Terrestrial	Terrestrial	9,800.00
Juneau	Sitka	Terrestrial		4,263.00
Juneau	Skagway	Terrestrial		4,261.00
Juneau	Valdez	Terrestrial	Terrestrial	9,124.00
Juneau	Whittier	Terrestrial	Terrestrial	8,624.00

Kenai	Cordova	Terrestrial	Satellite	17,347.00
Kenai	Delta Jct.	Terrestrial	Terrestrial	7,059.00
Kenai	Dillingham	Terrestrial	Satellite	17,347.00
Kenai	Dutch Harbor	Terrestrial	Satellite	17,347.00
Kenai	Eagle River	Terrestrial		3,836.00
Kenai	Fairbanks	Terrestrial	Terrestrial	8,555.00
Kenai	Glennallen	Terrestrial	Terrestrial	6,629.00
Kenai	Homer	Terrestrial		2,175.00
Kenai	Juneau	Terrestrial	Terrestrial	9,185.00
Kenai	King Salmon	Terrestrial	Satellite	17,347.00
Kenai	Kodiak	Terrestrial	Satellite	17,347.00
Kenai	Nome	Terrestrial	Satellite	17,347.00
Kenai	Prudhoe Bay	Terrestrial	Terrestrial	9,425.00
Kenai	Seattle	Terrestrial	Terrestrial	15,899.00
Kenai	Sitka	Terrestrial	Terrestrial	13,448.00
Kenai	Valdez	Terrestrial	Terrestrial	5,739.00
Kenai	DAMA Villages	Terrestrial	Satellite	17,347.00
Kenai	Whittier	Terrestrial	Terrestrial	5,239.00

Ketchikan	Barrow	Satellite		14,447.00
Ketchikan	Bethel	Satellite		14,447.00
Ketchikan	Cordova	Satellite		14,447.00
Ketchikan	DAMA Villages	Satellite		14,447.00

Ketchikan	Delta Jct.	Satellite	Terrestrial	18,606.00
Ketchikan	Dillingham	Satellite		14,447.00
Ketchikan	Dutch Harbor	Satellite		14,447.00
Ketchikan	Eagle River	Satellite		14,447.00
Ketchikan	Fairbanks	Satellite		14,447.00
Ketchikan	Glennallen	Satellite	Terrestrial	18,176.00
Ketchikan	Kenai	Satellite	Terrestrial	17,347.00
Ketchikan	King Salmon	Satellite		14,447.00
Ketchikan	Kodiak	Satellite		14,447.00
Ketchikan	Kotzebue	Satellite		14,447.00
Ketchikan	Nome	Satellite		14,447.00
Ketchikan	Prudhoe Bay	Satellite	Terrestrial	18,947.00
Ketchikan	Seattle	Satellite		14,447.00
Ketchikan	Valdez	Satellite	Terrestrial	17,286.00
Ketchikan	Homer	Terrestrial	Terrestrial	21,870.00
Ketchikan	Juneau	Terrestrial		10,500.00

King Salmon	Barrow	Satellite		14,447.00
King Salmon	Bethel	Satellite		14,447.00
King Salmon	Cordova	Satellite		14,447.00
King Salmon	Dillingham	Satellite		14,447.00
King Salmon	Dutch Harbor	Satellite		14,447.00
King Salmon	Eagle River	Satellite		14,447.00
King Salmon	Fairbanks	Satellite		14,447.00
King Salmon	Homer	Satellite	Terrestrial	19,552.00
King Salmon	Juneau	Satellite		14,447.00
King Salmon	Kenai	Satellite	Terrestrial	17,347.00
King Salmon	Ketchikan	Satellite		14,447.00
King Salmon	Kodiak	Satellite		14,447.00
King Salmon	Kotzebue	Satellite		14,447.00
King Salmon	Nome	Satellite		14,447.00
King Salmon	Seattle	Satellite		14,447.00
King Salmon	Sitka	Satellite		14,447.00
King Salmon	DAMA Villages	Satellite		14,447.00

Kodiak	Barrow	Satellite		14,447.00
Kodiak	Bethel	Satellite		14,447.00
Kodiak	Cordova	Satellite		14,447.00
Kodiak	Dillingham	Satellite		14,447.00
Kodiak	Dutch Harbor	Satellite		14,447.00
Kodiak	Eagle River	Satellite		14,447.00
Kodiak	Fairbanks	Satellite		14,447.00
Kodiak	Homer	Satellite	Terrestrial	19,522.00
Kodiak	Juneau	Satellite		14,447.00
Kodiak	Kenai	Satellite	Terrestrial	17,347.00
Kodiak	Ketchikan	Satellite		14,447.00
Kodiak	King Salmon	Satellite		14,447.00
Kodiak	Kotzebue	Satellite		14,447.00
Kodiak	Nome	Satellite		14,447.00

Kodiak	Prudhoe Bay	Satellite		14,447.00
Kodiak	Seattle	Satellite		14,447.00
Kodiak	Seward	Satellite	Terrestrial	17,962.00
Kodiak	Sitka	Satellite		14,447.00
Kodiak	Valdez	Satellite		14,447.00
Kodiak	DAMA Villages	Satellite		14,447.00

Kotzebue	Barrow	Satellite		14,447.00
Kotzebue	Bethel	Satellite		14,447.00
Kotzebue	Cordova	Satellite		14,447.00
Kotzebue	Dillingham	Satellite		14,447.00
Kotzebue	Dutch Harbor	Satellite		14,447.00
Kotzebue	Eagle River	Satellite		14,447.00
Kotzebue	Fairbanks	Satellite		14,447.00
Kotzebue	Juneau	Satellite		14,447.00
Kotzebue	King Salmon	Satellite		14,447.00
Kotzebue	Kodiak	Satellite		14,447.00
Kotzebue	Nome	Satellite		14,447.00
Kotzebue	Seattle	Satellite		14,447.00
Kotzebue	DAMA Villages	Satellite		14,447.00

Nome	Barrow	Satellite		14,447.00
Nome	Bethel	Satellite		14,447.00
Nome	Cordova	Satellite		14,447.00
Nome	Dillingham	Satellite		14,447.00
Nome	Dutch Harbor	Satellite		14,447.00
Nome	Eagle River	Satellite		14,447.00
Nome	Fairbanks	Satellite		14,447.00
Nome	Juneau	Satellite		14,447.00
Nome	Ketchikan	Satellite		14,447.00
Nome	King Salmon	Satellite		14,447.00
Nome	Kodiak	Satellite		14,447.00
Nome	Kotzebue	Satellite		14,447.00
Nome	Seattle	Satellite		14,447.00
Nome	DAMA Villages	Satellite		14,447.00

Palmer	DAMA Villages	Terrestrial	Satellite	15,355.00
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Prudhoe Bay	Barrow	Satellite		14,447.00
Prudhoe Bay	Bethel	Satellite		14,447.00
Prudhoe Bay	DAMA Villages	Satellite		14,447.00
Prudhoe Bay	Dillingham	Satellite		14,447.00
Prudhoe Bay	Dutch Harbor	Satellite		14,447.00
Prudhoe Bay	Ketchikan	Satellite		14,447.00
Prudhoe Bay	King Salmon	Satellite		14,447.00
Prudhoe Bay	Kodiak	Satellite		14,447.00
Prudhoe Bay	Kotzebue	Satellite		14,447.00
Prudhoe Bay	Coldfoot	Terrestrial		1,500.00
Prudhoe Bay	Eagle River	Terrestrial		7,461.00

Prudhoe Bay	Fairbanks	Terrestrial		4,500.00
Prudhoe Bay	Glennallen	Terrestrial		5,519.00
Prudhoe Bay	Juneau	Terrestrial		12,810.00
Prudhoe Bay	Kenai	Terrestrial	Terrestrial	9,425.00
Prudhoe Bay	Seattle	Terrestrial		19,524.00
Prudhoe Bay	Valdez	Terrestrial		5,869.00

Seattle	Barrow	Satellite		14,447.00
Seattle	Bethel	Satellite		14,447.00
Seattle	Cordova	Satellite		14,447.00
Seattle	DAMA Villages	Satellite		14,447.00
Seattle	Dillingham	Satellite		14,447.00
Seattle	Dutch Harbor	Satellite		14,447.00
Seattle	Ketchikan	Satellite		14,447.00
Seattle	King Salmon	Satellite		14,447.00
Seattle	Kodiak	Satellite		14,447.00
Seattle	Kotzebue	Satellite		14,447.00
Seattle	Nome	Satellite		14,447.00

Seattle	Delta Jct.	Terrestrial		17,158.00
Seattle	Eagle River	Terrestrial	Terrestrial	13,935.00
Seattle	Fairbanks	Terrestrial		14,499.00
Seattle	Glennallen	Terrestrial		16,728.00
Seattle	Homer	Terrestrial	Terrestrial	18,074.00
Seattle	Juneau	Terrestrial		12,375.00
Seattle	Kenai	Terrestrial	Terrestrial	15,899.00
Seattle	Prudhoe Bay	Terrestrial		19,524.00
Seattle	Seward	Terrestrial	Terrestrial	16,514.00
Seattle	Sitka	Terrestrial	Terrestrial	16,638.00
Seattle	Valdez	Terrestrial	Terrestrial	15,838.00
Seattle	Whittier	Terrestrial		15,338.00

Seward	Cordova	Satellite		14,447.00
Seward	Eagle River	Terrestrial	Terrestrial	4,451.00
Seward	Fairbanks	Terrestrial	Terrestrial	9,170.00
Seward	Juneau	Terrestrial	Terrestrial	9,800.00

Sitka	Kodiak	Satellite		14,447.00
Sitka	DAMA Villages	Terrestrial	Satellite	18,710.00
Sitka	Fairbanks	Terrestrial	Terrestrial	15,763.00
Sitka	Juneau	Terrestrial		4,263.00
Sitka	Seattle	Terrestrial	Terrestrial	16,638.00
Sitka	Valdez	Terrestrial	Terrestrial	13,387.00

Valdez	Cordova	Satellite		14,447.00
Valdez	DAMA Villages	Satellite		14,447.00
Valdez	Dillingham	Satellite		14,447.00
Valdez	Dutch Harbor	Satellite		14,447.00
Valdez	Ketchikan	Satellite		14,447.00

Valdez	King Salmon	Satellite		14,447.00
Valdez	Kodiak	Satellite		14,447.00
Valdez	Delta Jct.	Terrestrial		2,497.00
Valdez	Fairbanks	Terrestrial		4,279.00
Valdez	Glennallen	Terrestrial		2,250.00
Valdez	Homer	Terrestrial	Terrestrial	7,914.00
Valdez	Juneau	Terrestrial	Terrestrial	9,124.00
Valdez	Kenai	Terrestrial	Terrestrial	5,739.00
Valdez	Prudhoe Bay	Terrestrial		5,869.00
Valdez	Seattle	Terrestrial	Terrestrial	15,838.00
Valdez	Seward	Terrestrial	Terrestrial	6,354.00

DAMA Villages	Barrow	Satellite		14,447.00
DAMA Villages	Bethel	Satellite		14,447.00
DAMA Villages	Cordova	Satellite		14,447.00
DAMA Villages	Dillingham	Satellite		14,447.00
DAMA Villages	Dutch Harbor	Satellite		14,447.00
DAMA Villages	Eagle River	Satellite		14,447.00
DAMA Villages	Fairbanks	Satellite		14,447.00
DAMA Villages	Juneau	Satellite		14,447.00
DAMA Villages	Kenai	Satellite		14,447.00
DAMA Villages	Ketchikan	Satellite		14,447.00
DAMA Villages	King Salmon	Satellite		14,447.00
DAMA Villages	Kodiak	Satellite		14,447.00
DAMA Villages	Kotzebue	Satellite		14,447.00
DAMA Villages	Nome	Satellite		14,447.00
DAMA Villages	North Pole	Satellite		14,447.00
DAMA Villages	Prudhoe Bay	Satellite		14,447.00
DAMA Villages	Seattle	Satellite		14,447.00
DAMA Villages	Seward	Satellite		14,447.00
DAMA Villages	Sitka	Satellite		14,447.00
DAMA Villages	Valdez	Satellite		14,447.00

Wasilla	DAMA Villages	Terrestrial	Satellite	15,355.00
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Whittier	Cordova	Terrestrial	Satellite	16,786.00
Whittier	DAMA Villages	Terrestrial	Satellite	16,786.00
Whittier	Ketchikan	Terrestrial	Satellite	16,786.00
Whittier	King Salmon	Terrestrial	Satellite	16,786.00
Whittier	Kodiak	Terrestrial	Satellite	16,786.00
Whittier	Kotzebue	Terrestrial	Satellite	16,786.00
Whittier	Seattle	Terrestrial	Terrestrial	15,338.00

Term Discounts:

Term Commitment	Discount
1 year	3%
2 year	4%
3 year	5%

5 year

10%

DAMA Villages:

Aleutians - East

Akutan*
Cold Bay*
False Pass*
King Cove*
Nelson Lagoon*
Sand Point*

Barrow Region

Anaktuvik Pass*
Atkasuk*
Kaktovik*
Nuiqsut*
Point Hope*
Point Lay*
Wainwright*

Dillingham Region

Chignik*
Chignik Lagoon*
Chignik Lake*
Clarks Point*
Ekwok
Iliamna*
Koliganek*
Levelock
Manokotak*
New Stuyahok
Nondalton*
Perry Village*
Pilot Point*
Port Heiden*
Togiak

Kotzebue Region

Ambler*
Buckland*
Deering*
Kiana*
Kivalina*
Kobuk*
Noatak*
Noorvik*
Red Dog*
Selawik*
Shungnak*

Nome Region

Elim*
Golovin*
Koyuk
Shaktoolik*
Shishmaref*
St. Michael
Stebbins*
Teller
Unalakleet
Wales*
White Mountain

EFFECTIVE: December 13, 2005