

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<i>In the Matter of</i>	)	
	)	
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
	)	
Universal Service Reform – Mobility Fund	)	WT Docket No. 10-208

**REPLY COMMENTS OF GENERAL COMMUNICATION, INC.**

General Communication, Inc. (“GCI”) hereby expresses its support for CenturyLink,<sup>1</sup> AT&T,<sup>2</sup> Verizon,<sup>3</sup> and others’<sup>4</sup> requested waivers of the new call signaling rules (the “Rules”) adopted by the Commission as part of the Commission’s October 27, 2011 *Report and Order*.<sup>5</sup>

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<sup>1</sup> CenturyLink, Inc., Petition for Limited Waiver, WC Docket Nos. 10-90 et al. (filed Jan. 23, 2012).

<sup>2</sup> AT&T Inc., Petition for Limited Waiver, WC Docket Nos. 10-90 et al. (filed Dec. 29, 2011).

<sup>3</sup> Verizon, Petition for Limited Waiver, WC Docket Nos. 10-90 et al. (filed Feb. 10, 2012).

<sup>4</sup> *See, e.g.*, Hawaiian Telcom Inc., Petition for Limited Waiver, WC Docket Nos. 10-90 et al. (filed Mar. 1, 2012).

<sup>5</sup> *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking at Appendix A, 47 C.F.R. § 64.1601(a)(1) & (2), WC Docket Nos. 10-90 et al. (rel. Nov. 18, 2011).

These requests, like GCI's Request for Limited Waiver,<sup>6</sup> demonstrate that there are many circumstances where carriers face technical obstacles that prevent strict compliance with the Commission's call signaling rules and where waiver is therefore appropriate.

Grant of the requested waivers is particularly appropriate in light of the Commission's adoption of forward-looking reforms that will end industry reliance on the call signaling information required by the Rules. As Verizon persuasively explains, it would be "inappropriate for the Commission to expect carriers to make significant changes to call signaling practices for intercarrier billing purposes where any investment in the technology and equipment necessary to do so would be wasted after just a few years."<sup>7</sup>

Respectfully submitted,

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/s/

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<sup>6</sup> General Communication, Inc., Petition for Limited Waiver, WC Docket Nos. 10-90 et al. (filed Feb. 27, 2012).

<sup>7</sup> Petition for Clarification or, In the Alternative, for Reconsideration of Verizon at 10, WC Docket Nos. 10-90 et al. (filed Dec. 29, 2011).