

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Advancing Broadband Availability Through Digital Literacy Training	)	WC Docket No. 12-23

**COMMENTS OF GENERAL COMMUNICATION, INC.**

Tina Pidgeon  
General Counsel and Senior Vice  
President, Governmental Affairs  
Martin Weinstein  
Regulatory Counsel  
Chris Nierman  
Director, Federal Regulatory  
Affairs  
GENERAL COMMUNICATION, INC.  
1350 I Street, N.W., Suite 1260  
Washington, D.C. 20005  
(202) 457-8812

John T. Nakahata  
Patrick P. O'Donnell  
Charles D. Breckinridge  
Jacinda A. Lanum  
WILTSHIRE & GRANNIS LLP  
1200 Eighteenth Street, N.W.  
Washington, D.C. 20036  
(202) 730-1300

*Counsel for General Communication, Inc.*

April 2, 2012

## TABLE OF CONTENTS

I.	INTRODUCTION AND SUMMARY. ....	1
II.	THE COMMISSION SHOULD PRESERVE THE CURRENT LIFELINE SUPPORT AMOUNT AND SHOULD PRESERVE LINK UP FOR TRIBAL LANDS.....	2
III.	ANY ATTEMPT TO FOSTER SUPPORT FOR MULTIPLE LINES WITHIN A HOUSEHOLD MUST CONSIDER HOUSEHOLD ECONOMICS .....	6
IV.	THE COMMISSION SHOULD PERMIT, BUT NOT REQUIRE, ETCS TO ALLOW SUBSCRIBERS TO APPLY THEIR LIFELINE DISCOUNT ON ANY BUNDLE THAT INCLUDES A VOICE COMPONENT.....	7
V.	THE PROPOSALS TO ADD WIC TO THE LIST OF QUALIFYING PROGRAMS SHOULD BE ADOPTED WITHOUT PREEMPTING STATES THAT HAVE ALREADY TAKEN THAT STEP, AND INDIVIDUALS VERIFIED AS HOMELESS BY A RECOGNIZED SERVICE AGENCY SHOULD QUALIFY FOR LIFELINE. ....	8
VI.	THE COMMISSION SHOULD NOT IMPOSE A DECADE-LONG LIFELINE DOCUMENT-RETENTION REQUIREMENT. ....	11
VII.	CONCLUSION.....	13

General Communication, Inc. (“GCI”) offers the following comments in response to the Commission’s Further Notice of Proposed Rulemaking regarding Lifeline.<sup>1</sup>

## **I. INTRODUCTION AND SUMMARY.**

These comments address five sets of issues identified in the Lifeline FNPRM.

First, as the Commission extends its efforts to reform the Lifeline program, it should take care to preserve core elements that have proven their worth. In particular, the Commission should not change the current Lifeline support amount for voice service—particularly on Tribal lands—because the current rate has proven effective in achieving increased penetration in remote areas like Alaska, and lowering the support amount risks once again putting basic phone service out of reach for those who need it most. For the same reason, the Commission should not eliminate Link Up support on Tribal lands, where penetration rates remain lower than the national average and where less robust infrastructure can lead to higher connection costs for some ETCs.

Second, in considering ways to ameliorate the core limitation of the one-per-household rule in the mobile telephony era—namely, the fact that the one supported line may leave most of the household without communication when one person walks out the door with it—the Commission must consider the impact of its new “economic unit” definition. This means that the proposal to split the existing support amount among several lines in the household provides no additional benefit at all, but the proposal to provide supplemental support for a second line at a lower level does.

---

<sup>1</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23 (rel. Feb. 6, 2012) (“Lifeline FNPRM”).

Third, the Commission should guard against imposing additional administrative limitations affecting broadband and other bundled services, given the newly enacted pilot program for broadband Lifeline. In particular, it should allow but not require ETCs to permit customers to apply Lifeline benefits to bundled service offerings, relying on the pilot programs and the marketplace to allow consumers to determine the most beneficial arrangements.

Fourth, the Commission should enact its sensible proposals to extend eligibility to recipients of the Special Supplemental Nutrition Assistance Program for Women, Infants, Children (WIC) and to allow homeless veterans to qualify for Lifeline based on a certification from the Veterans Administration. It should maximize the impact of these modifications and minimize their burden by avoiding the pre-emption of state regulations that already include WIC as a Lifeline-eligible program and by extending the proposed homelessness rule to provide the same treatment to all homeless people with similar verifying declarations.

Finally, the Commission should reject the extraordinary proposal to add to the already extreme administrative burden of this program by requiring ETCs to maintain Lifeline documentation for a full decade—particularly ETCs already subject to new biennial audit requirements.

**II. THE COMMISSION SHOULD PRESERVE THE CURRENT LIFELINE SUPPORT AMOUNT AND SHOULD PRESERVE LINK UP FOR TRIBAL LANDS.**

GCI here responds to the Commission’s request for comment on whether to continue with a flat rate of reimbursement,<sup>2</sup> how it should determine the size of the support amount for voice service,<sup>3</sup> and whether enhanced Link Up support for Tribal lands remains necessary.<sup>4</sup>

---

<sup>2</sup> *Id.* ¶ 463.

<sup>3</sup> *Id.* ¶ 464.

<sup>4</sup> *Id.* ¶ 482.

A flat rate of reimbursement remains sensible and one of the few remaining elements of the program that is relatively simple to administer. The proposal to establish and administer geographically varied support rates would re-inject administrative complexity that the Commission eliminated when it created a uniform Lifeline support rate in lieu of Tiers 1 through 3, and thus further increase the already too high administrative cost of the program to carriers, USAC, and the Commission. It should be rejected out of hand.

The Commission should maintain the current level of Lifeline support in all areas. Reducing the amount of support would directly increase the cost of service to low-income consumers, with the predictable impact of again widening the gap in communications access for this segment of our country. The proposal would also disregard the evidence that the current level of Lifeline support has been effective. Data compiled by the FCC show that in 1994, when Alaska began providing Lifeline support, only 72 percent of Alaskan households with annual incomes of less than \$20,732 (2009 dollars, and less than the Federal Poverty Guidelines for a family of three) subscribed to telephone service.<sup>5</sup> In 2009, the penetration rate for this segment of the population had grown to 91.9 percent.<sup>6</sup> The program has a similar record of increased subscribership slightly farther up the low-income ladder. Among households with annual income less than \$41,464 (2009 dollars), only 82.2 percent subscribed to telephone service in 1994, but by 2009 the penetration rate had reached 92.2 percent.<sup>7</sup>

---

<sup>5</sup> See *Telephone Penetration by Income by State* at 11, Federal Communications Commission (May 2010), available at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-297986A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-297986A1.pdf). The FCC data measure income in 1984 dollars. \$10,000 in 1984 dollars equates to \$20,732 in 2009 dollars.

<sup>6</sup> *Id.* at 12.

<sup>7</sup> *Id.* at 11-12.

Moreover, reducing support now would undermine low-income consumers' decisive move away from landlines to mobile telephony, and the sound, practical reasons for that move. Breaking telephony's tether to structures makes communications much more flexible and valuable. A mobile phone provides 911 service where consumers are, not just where they live. It gives the homeless and others in unstable living arrangements the ability to maintain contact with family, friends, and potential employers, despite transient lives. The public-safety benefits are particularly important in Alaska, where extreme weather and the uniquely vast distances that separate population centers make mobile communications a potential lifesaver.<sup>8</sup> But wireless telephony costs more than wired, and reducing the Lifeline subsidy would relegate more of the low-income population to a limited, wireline-only system, widening rather than closing their communications gap with the rest of America.

The Commission's introduction of supplemental Tribal Lands Lifeline support in 2000 has also demonstrably improved telephone subscribership in Alaska. From 1994 to 1999, before Tribal lands support was introduced, households with annual income less than \$41,464 (2009 dollars) averaged 90.3 percent subscribership.<sup>9</sup> From 2000 to 2009, with Tribal Lands Lifeline support in effect, subscribership among the same group of households averaged 94.8 percent.<sup>10</sup> These data demonstrate that the current level of support is accomplishing the goals of the program and that there is no reason to roll it back now.

---

<sup>8</sup> See Comments of General Communication, Inc., at 4-6, WC Docket Nos. 11-42, 03-109, CC Docket 96-45 (filed Apr. 21, 2011).

<sup>9</sup> See *Telephone Penetration by Income by State*, *supra*, n.11, at 11-12.

<sup>10</sup> *Id.*

Despite this progress, and as the Commission has noted, telephone penetration rates on Tribal lands remain very low.<sup>11</sup> For this reason, the Commission should not eliminate Link Up support on Tribal lands. Link Up support is important to some ETCs with operations in rural areas, such as Tribal villages in Alaska. A 2003 analysis prepared by Commission staff showed that the national rate of wireline and wireless telephone subscribership was 97.6%, but only 67.9% of Native American households on Tribal lands had telephone service.<sup>12</sup> Some Tribal areas had significantly lower subscribership rates than the average Tribal area rate of 67.9%.<sup>13</sup> For example, the Navajo lands had a subscribership rate of only 37.4%.<sup>14</sup> These still-unacceptable results may reflect the fact that Tribal lands are sometimes characterized by less robust infrastructure and hence higher connection costs for some ETCs serving them. Given this record, the elimination of Link Up on Tribal lands would clearly disserve the objectives of universal-service support and, in particular, further disadvantage a segment of the American population that has long suffered from much poorer telecommunications access than most of our country.

Finally, the timing is particularly inopportune for any new reduction in Lifeline or Link Up support levels. The Commission has just enacted, and carriers are just beginning to implement, a comprehensive overhaul which the Commission estimates may save up to \$2

---

<sup>11</sup> *See Lifeline and Link Up Reform and Modernization, Federal-State Joint Board on Universal Service, Lifeline and Link Up*, Notice of Proposed Rulemaking, WC Docket No. 11-42, CC Docket No. 96-45, WC Docket No. 03-109, ¶ 146 (rel. Mar. 4, 2011).

<sup>12</sup> *Improving Communications Services for Native Nations by Promoting Greater Utilization of Spectrum over Tribal Lands*, Notice of Proposed Rulemaking, WT Docket No. 11-40, ¶ 4 (rel. Mar. 3, 2011) (citing Telephone Subscribership on American Indian Reservations and Off Reservation Trust Lands, Federal Communications Commission, May 2003, at 1).

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

billion over the next three years.<sup>15</sup> To the extent the Commission might consider reduced support as means of curbing growth in the fund, the new reforms should be allowed to take effect first so that the Commission can assess their impact on demand for the fund. The reforms generally make it harder for consumers to qualify for support and harder for carriers to establish entitlement to reimbursement. The Commission should also evaluate the resultant impact on access to service by low-income consumers before considering any reduction in support levels.

### **III. ANY ATTEMPT TO FOSTER SUPPORT FOR MULTIPLE LINES WITHIN A HOUSEHOLD MUST CONSIDER HOUSEHOLD ECONOMICS .**

The Commission seeks comment on two proposals to provide support for multiple lines or services for a single household: either splitting the set support amount among two or more lines<sup>16</sup> or allowing a lower but separate amount of supplemental support for additional lines.<sup>17</sup> The first proposal is not sensible, but the second is.

Splitting a set support amount among two or more phone lines in a single household would provide literally no economic benefit to subscribers, because the new definition of “household” limits it to an “economic unit” which “consists of all adult individuals contributing to and sharing in the income and expenses.”<sup>18</sup> Thus, whether allocated to a single line or divided among five, a set support amount has precisely the same value to the household sharing in expenses such as phone service. The *only* effect of this proposal would be to yet further increase administrative burden and expenses, as the same support dollars would have to be allocated among multiple lines, and ETCs would have to determine how to provide, track, and bill split discounts, and they might have to modify their systems in order to do so. While *allowing* an

---

<sup>15</sup> Lifeline FNPRM, ¶2.

<sup>16</sup> Lifeline FNMPRM ¶ 470.

<sup>17</sup> *Id.*, ¶ 471.

<sup>18</sup> Lifeline Order, Appendix A, § 54.400(h).

ETC to split support among several lines to a household might do no harm, *requiring* it manifestly will.

In contrast, T-Mobile's proposal to allow households receiving one Lifeline-supported service to obtain an additional 50 percent support on a second line<sup>19</sup> could ameliorate the greatest harm caused by the one-per-household limitation: if the only telephone in a Lifeline household is a mobile telephone, then the other members of the household would be without a telephone whenever anyone walks out the door with it. Similarly, if the only telephone in the household is a land line, then members of the household will be entirely without a telephone when they leave the home. A 50 percent subsidy on second lines would, of course, add administrative burden for carriers,<sup>20</sup> but it would also offer economic benefit to subscriber households, would mitigate the manifest public safety risks created by a pure one-per-household rule, and would therefore further the goals of the low-income program.

#### **IV. THE COMMISSION SHOULD PERMIT, BUT NOT REQUIRE, ETCs TO ALLOW SUBSCRIBERS TO APPLY THEIR LIFELINE DISCOUNT ON ANY BUNDLE THAT INCLUDES A VOICE COMPONENT.**

The Commission seeks comment on whether to revise its rules to require ETCs to permit subscribers to apply their Lifeline discount on any bundle that includes a voice component.<sup>21</sup>

The Commission should permit, but not require, ETCs to allow subscribers to apply their discount to bundled services.

---

<sup>19</sup> *Id.* ¶ 471.

<sup>20</sup> Paperwork and other administrative requirements for partial support on second lines can and should be minimized. The Commission should allow ETCs the flexibility to associate second lines with the main supported lines in any manner consistent with their existing systems for "family plans," so that they can leverage existing systems rather than create new ones. The application requirements should be similarly minimal, avoiding any requirement to conduct duplicative eligibility-proof checks or recertifications.

<sup>21</sup> Lifeline FNPRM ¶ 490.

ETCs have a wide variety of different billing and other administrative systems. Some providers' systems may be readily adaptable to extending Lifeline support to bundled plans without running afoul of the program's extraordinarily complex administrative requirements. Others, however, might face enormous back-end burdens in reconfiguring their systems to accommodate Lifeline support for bundles in Lifeline's unique regulatory structure. Allowing but not requiring the use of Lifeline support for bundled service offerings will permit the interplay of consumer choice, ETC administrative structures, and the market to foster the evolution of effective supported bundles that meet real consumer need, without adding yet more administrative cost.

Furthermore, the Commission is just beginning its pilot program to test Lifeline support for broadband service.<sup>22</sup> The pilot program will allow for the testing and evolution of systems that will be needed to implement Lifeline for broadband. Mandating the application of Lifeline support to bundled services across the board now would short-circuit the marketplace evolution that the pilot program is intended to foster, and waste resources by forcing ETCs to rush administrative systems into place prematurely, without the benefit of the Lifeline broadband pilot program's experience.

**V. THE PROPOSALS TO ADD WIC TO THE LIST OF QUALIFYING PROGRAMS SHOULD BE ADOPTED WITHOUT PREEMPTING STATES THAT HAVE ALREADY TAKEN THAT STEP, AND INDIVIDUALS VERIFIED AS HOMELESS BY A RECOGNIZED SERVICE AGENCY SHOULD QUALIFY FOR LIFELINE.**

The Commission seeks comment on measures to moderately expand Lifeline eligibility by adding WIC to the list of Lifeline-qualifying programs<sup>23</sup> and by enabling veterans who lack any income, but are not otherwise enrolled in a qualifying program, to demonstrate eligibility for

---

<sup>22</sup> See *id.* ¶ 323.

<sup>23</sup> *Id.* ¶¶483-85.

Lifeline.<sup>24</sup> Both are eminently sensible and should be adopted but could be measurably improved with certain modifications.

As the Commission notes, WIC is an anti-poverty program serving largely the same population served by other Lifeline-qualifying programs, with eligibility requirements that overlap substantially with those programs. Adding WIC has a major, straight-forward administrative benefit: struggling and substantively eligible Lifeline recipients who have trouble keeping track of programmatic paperwork would have another way to demonstrate eligibility, and thus fewer would be turned away for lack of documentation rather than substantive ineligibility. As “over 35 percent of WIC participants do not participate in another federal assistance program,” the proposal might also help the Lifeline program reach individuals who are similarly situated to currently eligible recipients but substantively ineligible under the current regulations. Some states, such as Alaska, have already added WIC to their list of Lifeline-qualifying programs.<sup>25</sup> The Commission should take care in structuring the addition of WIC to the federal list of qualifying programs not to inadvertently preempt state WIC qualifications that might differ in scope or administrative detail.

The proposed homeless-veteran provision would allow a consumer who lacks any income to qualify for Lifeline by signing a certification under penalty of perjury that he or she has no income, and by obtaining from a Veterans Affairs outreach worker or program coordinator a certification that the person in question is a homeless veteran or at risk of becoming homeless.<sup>26</sup>

---

<sup>24</sup> *Id.* ¶ 487.

<sup>25</sup> *See* Order No. 2, *In re GCI, et al.*, Regulatory Commission of Alaska, U-08-128, Jan. 30, 2009.

<sup>26</sup> *Id.*

This proposal is excellent public policy; it responds thoughtfully and carefully to address an obvious deficiency in the Lifeline program. A homeless veteran is likely to have virtually no income at all—the paradigmatic example of the type of person the program is intended to aid. Yet, in an irony Kafka would appreciate, he would be disabled by that very fact from producing the proof of income required by the newly amended regulation.<sup>27</sup> The proposal to allow alternative qualification by the dual certification of the homeless veteran and a Veterans Administration official serving him is an innovative attempt to remedy this Catch-22 while safeguarding against fraudsters who might simply have no compunction about lying, even under penalty of perjury.

But the dilemma of the homeless and incomeless veteran is one shared by any homeless, incomeless person. In fact, it is one shared by every homeless person. The homeless are, as a group, clearly in need of Lifeline support. By and large, people do not live on the street or in shelters if they can afford better. Yet many homeless people are incomeless (or lacking documentation for the meager income they may have) and thus face the same Catch-22 that the Commission has realized in the case of the homeless veteran. And all homeless people face enormous practical challenges in gathering, storing, and presenting income or any other qualifying documentation. Whether they simply have no income or their itinerant suffering prevents them from gathering, storing, and presenting the type of documentation required by such careful and precise regulations as 48 C.F.R. §54.410(b)(1)(i)(B), the population segment with the greatest need for Lifeline is the one least able to clear its administrative hurdles.

The Commission can address this dilemma responsibly by a simple tweak and expansion of the proposal for homeless veterans: any homeless person who submits a certification under

---

<sup>27</sup> See *id.*, Appendix A, §54.410(b)(1)(i)(B) (requiring ETCs to examine proof of income and providing examples of acceptable proof).

penalty of perjury attesting to his homelessness should be qualified for Lifeline if he also presents a supporting declaration attesting to the same from a homeless shelter or similar charitable organization serving the homeless, such as a soup kitchen. The Commission can leverage existing support structures and gain a bulwark against fraud by limiting the list of acceptable supporting organizations to ones with 501(c)(3) status under the Internal Revenue Code, agencies affiliated with local, state or federal governments, and/or organizations accredited by an entity such as the Council on Accreditation.<sup>28</sup>

#### **VI. THE COMMISSION SHOULD NOT IMPOSE A DECADE-LONG LIFELINE DOCUMENT-RETENTION REQUIREMENT.**

The Commission proposes to amend its rules to extend the retention period for Lifeline documentation, including subscriber-specific eligibility documentation, to at least ten years.<sup>29</sup> This is an extraordinary expansion of Lifeline's administrative burden, and far out of line with other federally imposed record-keeping requirements.

The only proffered justification is to foster False Claims Act litigation over Lifeline,<sup>30</sup> but there is no basis in the record before the Commission suggesting that Lifeline is uniquely susceptible to the long-term burying of fraud. Notably, other government programs, including programs that have decades of experience in fighting beneficiary and provider fraud, impose far less burdensome record-retention requirements. For instance, state agencies administering the Supplemental Nutrition Assistance Program must retain all program records for a period of three years.<sup>31</sup> Department of Housing and Urban Development regulations require grant recipients to

---

<sup>28</sup> The Council's guidelines for accrediting homeless shelters may be found at <http://www.coastandards.org/pdf/makepdf.php?id=70>.

<sup>29</sup> Lifeline FNPRM ¶ 506.

<sup>30</sup> *Id.*, ¶¶ 505-506.

<sup>31</sup> 7 C.F.R. § 272.1(f).

retain for a period of three years financial records, supporting documents, statistical records, and all other records pertinent to an award.<sup>32</sup> Medicare regulations provide that “[m]edical records must be retained in their original or legally reproduced form for a period of at least 5 years.”<sup>33</sup> Even the Internal Revenue Service requires individual taxpayers to retain records for only three years.<sup>34</sup>

A ten-year record-retention requirement would generate enormous costs. Billing and account systems are constantly changing, and electronic records created a decade earlier are often unreadable in present-day systems and require expensive retrieval and restoration efforts to make useful. The sheer volume of material required to “document compliance with all Commission and state requirements governing the Lifeline/Link Up programs” is vast; a decade’s worth of such material may require the hiring of archivists to store it in any useful, orderly fashion. The constant evolution of communications technologies, business structures, and Lifeline regulations, when combined with the natural turnover of personnel over the course of a decade, means that comparatively few people in any company will have any useful understanding at all of decade-old records that documented compliance with long-superseded regulations, in since-abandoned business structures, using now-mothballed technology. After ten years, few will be able to even determine, let alone understand and evaluate, the records required to document compliance with all Lifeline regulatory requirements as they stood ten years before.

---

<sup>32</sup> 24 C.F.R. § 84.53(b).

<sup>33</sup> 42 C.F.R. § 482.24(b)(7).

<sup>34</sup> See 26 U.S.C. § 6501 (establishing three year statute of limitations for most tax returns); Internal Revenue Service Publication 552 (rev. Jan. 2011) (instructing taxpayers to retain tax returns for three years), *available at* <http://www.irs.gov/pub/irs-pdf/p552.pdf>.

The result of this proposal will be a bonanza for archiving and litigation-support vendors, little practical benefit to the Commission, and yet more Lifeline administrative woe to ETCs.<sup>35</sup>

## VII. CONCLUSION

The Lifeline program is unique among FCC programs: it uses the Universal Service Fund, private-sector carriers, and USAC to fund and administer a nationwide social-welfare program with administrative challenges akin to programs more commonly run by the Departments of Health and Human Services, Housing and Urban Development, and Agriculture. The foregoing analysis responds to the Commission's requests for comments on further proposed changes, with constructive criticism where appropriate and encouragement of proposals that seem well conceived in light of GCI's experience in the trenches of this program. But there should be no doubt that the Lifeline program has made a material difference in access to modern communications by low-income Americans, and it is of particular importance in Alaska's truly vast and unique environment—and in all Tribal Lands. The FCC's Lifeline program is a success story, and with careful, thoughtful stewardship, it can continue to close the telecommunications access and affordability gap for all Americans.

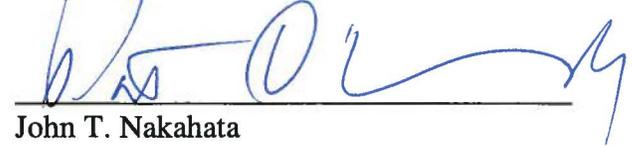
---

<sup>35</sup> At the very least, this extraordinary burden should not be imposed on ETCs who will also be subject to the new biennial audit requirement. *See* Lifeline Order ¶ 291. Over the course of a decade, they will already have borne the expense and burden of *five* audits of their “overall compliance” with all Lifeline program requirements—a proactive (and possibly even more expensive requirement) serving the same antifraud purpose. To impose both of these extraordinary and unwarranted burdens on this subset of carriers would be simply punitive.

Dated: April 2, 2012

Tina Pidgeon  
General Counsel and Senior Vice  
President, Governmental Affairs  
Martin Weinstein  
Regulatory Counsel  
Chris Nierman  
Director, Federal Regulatory  
Affairs  
GENERAL COMMUNICATION, INC.  
1350 I Street, N.W., Suite 1260  
Washington, D.C. 20005  
(202) 457-8812

Respectfully submitted,



John T. Nakahata  
Patrick P. O'Donnell  
Charles D. Breckinridge  
Jacinda A. Lanum  
WILTSHIRE & GRANNIS LLP  
1200 Eighteenth Street, N.W.  
Washington, D.C. 20036  
(202) 730-1300

*Counsel for General Communication, Inc.*