



April 5, 2012

Ex Parte

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 Inter-carrier Compensation Regime*, CC Docket No. 01-92

Dear Ms. Dortch:

On April 4, 2012, on behalf of General Communication, Inc. ("GCI"), I spoke with Michael Steffen, Legal Advisor to Chairman Genachowski. I reiterated the point from GCI's reply to petitions for reconsideration that there is no mechanism in the current rules to harmonize intrastate and interstate rates for terminating Tandem-Switched Transport Access Service and originating and terminating Dedicated Transport Access Service. Thus, in any jurisdiction in which the aggregate interstate rate for Transitional Intrastate Access Service exceeded the aggregate intrastate rate, these elements would remain jurisdictionalized and would not have harmonized access rate levels and rate structures, unlike all other areas of the country. This should be addressed prior to July 1, 2012, so that harmonization of these rates can occur in parallel with the rest of the country.

Please contact me if you have any questions.

Sincerely,

John T. Nakahata
Counsel to General Communication Inc.

cc: Michael Steffen
Randy Clarke
Doug Slotten