

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

<i>In the Matter of</i>	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
Universal Service Reform – Mobility Fund	)	WT Docket No. 10-208
	)	
Petition for Waiver of Windy City Cellular, LLC	)	

**COMMENTS OF GENERAL COMMUNICATION, INC.**

General Communication, Inc. (“GCI”) hereby comments on Windy City Cellular’s (“Windy City”) Petition for Waiver of 54.307(e), which placed an annual \$3,000 per-line cap on high-cost support received by a competitive eligible telecommunications carrier (“CETC”) as of January 1, 2012. GCI neither opposes nor supports Windy City’s Petition, so long as any such waiver correspondingly increases the Remote Alaska cap according to 54.307(e)(3)(v)(A) for the duration of the waiver. GCI would strongly oppose any waiver that increases Windy City’s support without likewise raising the cap. A contrary result would transfer support from other Remote Alaska areas to Windy City’s service area in Adak, Alaska, where GCI also provides wireless service subject to the \$3000 per-line annual limit.

GCI, under the brand name Alaska Wireless, provides wireless service to all or nearly all of the inhabited portions of Adak Island. GCI’s support in Adak, and the rest of Remote Alaska, is capped at \$3000 per line. GCI does not dispute the results of Windy City’s drive tests, which confirm that GCI’s coverage substantially, if not completely, overlaps Windy City’s coverage in

the inhabited areas.<sup>1</sup> Windy City operates two cell sites at 800 MHz, while GCI operates a single cell site and an indoor repeater at 1900 MHz. Accordingly, Windy City has a larger coverage boundary. This additional area is limited primarily, if not exclusively, to uninhabited portions of Adak. GCI, like Windy City, operates a GSM network in Adak. Provided that Windy City has sold multi-band phones to its customers that would permit operation in the 1900 MHz band – as it appears is the case from the handsets listed on Windy City’s website – a Windy City subscriber should be able to convert to GCI service simply by changing the SIM card. In addition, any GSM phone should be able to roam in the GCI’s Adak coverage area, provided that the consumer’s carrier has a roaming arrangement with GCI. GCI maintains its own backhaul from Adak to the rest of Alaska and the world.

Section 54.307(e) of the Commission’s rules would appear to increase the statewide cap on CETC support to Remote Alaska in the event that the Commission grants Windy City’s Petition, because Windy City’s “total 2011 support” would increase, which in turn would increase the level of the cap amount specified in 54.307(e)(3)(v)(A). This is the correct result from a public policy perspective. If the Commission were to apply 54.37(e)(v)(A) in a manner that did not increase the cap amount, support would shift from other parts of Remote Alaska to Adak. This would reduce the amount of support available for new and upgraded deployments, in favor of supporting a network for which there is already coverage in all or nearly all inhabited areas. Such a reallocation would not align with Commission reform efforts and would result in a misallocation of scarce universal service resources.

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<sup>1</sup> See e.g. Petition of Windy City Cellular, Exhibit 2 (filed April 18, 2012).

