



GEORGE M. FOOTE
Partner
(202) 442-3518
FAX (202) 442-3199
foote.george@dorsey.com

June 15, 2012

Via Electronic Filing

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

EX PARTE COMMUNICATION

Re: Notice of Ex Parte Meeting; 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 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; Report and Order and Further Notice of Proposed Rulemaking FCC 11-161 (rel. Nov. 18, 2011) ("Transformation Order")

Dear Ms. Dortch:

The Alaska Rural Coalition ("ARC")¹ files this ex parte notification with respect to a meeting on Monday, June 11, 2012 with Wireline Competition Bureau staff members Daniel Ball, Amy Bender, Joe Cavender, Randy Clarke, and Christopher Koves. The ARC was represented at the meeting by Doug Neal, Chief Executive Officer of OTZ Telephone Cooperative, Inc., of Kotzebue, Alaska; Paul Kelly, General Manager and CEO of Cordova Telephone Cooperative, Inc., of Cordova, Alaska; and George Foote of Dorsey & Whitney, LLP, counsel to the ARC. Michael Burke of Burke Watson, Inc., consultant to the ARC, participated by telephone. Eric Kleber of the Western Telecommunications Alliance attended, and members of the ARC were able to monitor the meeting by telephone conference.

¹ The ARC is composed of 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.

Ms. Dortch
June 15, 2012
Page 2

The specific purpose of the meeting was to discuss the ARC petition for a limited waiver of new call signaling rules issued by the Commission in the Transformation Order. ARC also reviewed the challenges in preserving universal telecommunications service in the most remote areas of the country.

With respect to the call signaling rules, Mr. Neal and Mr. Kelly showed that collection of advanced signaling data is impractical for many rural Alaska telephone companies because of the types of local exchange facilities and because of limitations imposed by IXC transmission facilities. They also described how their call analysis shows that the problem addressed by the call data requirement is not readily detectable in Alaska. Mr. Neal and Mr. Kelly noted that the ARC call signaling waiver application is consistent with similar petitions filed by other companies operating in Alaska.

Mr. Neal and Mr. Kelly described the extraordinary expense of constructing and operating telecommunications systems in the geography and climate of Alaska. They emphasized the necessity of universal service support for their large service areas with important industries and small populations. Mr. Neal and Mr. Kelly also described how the reduction in universal service funding and the prospect of further reduction of high cost loop support under future application of the new quantile regression analysis threatens continued service to native villages, fishermen, ships and tourists.

Mr. Neal and Mr. Kelly thanked the staff for the time devoted to consideration of the call signaling waiver and other matters important to maintaining universal service in Alaska.

Sincerely,

DORSEY & WHITNEY LLP

s/

George M. Foote

GMF/cer