



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

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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 Report-Mobility Fund, WT Docket 10-208

Dear Ms. Dortch:

The Alaska Rural Coalition ("ARC")¹ files this ex parte notification with respect to a meeting with Commissioner Ajit Pai and Matthew Berry, Chief of Staff to Commissioner Pai, on Monday, June 11, 2012. 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; 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.

The purpose of the meeting was to discuss the challenges in preserving universal telecommunications service in the most remote areas of the country. Mr. Neal and Mr. Kelly described the extraordinary expense of constructing and operating telecommunications systems

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.

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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 showed how the process of securing waivers from the various funding limitations and other requirements of the Connect America Fund poses a unique and exceptionally expensive challenge to small Alaskan companies. For assembling wireless coverage test data required by waiver applications, for example, Mr. Neal cited the impracticability of conducting drive tests by snow machine over the OTZ service area that is the size of the State of Indiana. Mr. Kelly showed how expensive it is to measure coverage over the large fishing grounds and busy shipping lanes in the Gulf of Alaska.

Mr. Neal and Mr. Kelly thanked Commissioner Pai and Mr. Berry for their attention to Alaska's unique telecommunications challenges and expressed the appreciation of all members of ARC for the attention that they and the rest of the Commission and staff have devoted to Alaskan telecommunications issues.

Sincerely,

DORSEY & WHITNEY LLP

s/

George M. Foote

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