WILTSHIRE & GRANNIS LLP

REDACTED FOR PUBLIC INSPECTION

September 11, 2012

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

Lynne Hewitt Engledow
Pricing Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Connect America Fund*, WC Docket N0. 10-90; *Universal Service Reform— Mobility Fund*, WT Docket No. 10-208

Dear Ms. Dortch and Ms. Engledow:

On behalf of General Communication, Inc. ("GCI"), undersigned counsel submits the attached ex parte containing Confidential Information pursuant to the *Protective Order* issued in the above-captioned proceedings on September 16, 2010. The Confidential Information included in this ex parte notice is derived from the April 3, 2012 confidential petition for waiver of Windy City Cellular, LLC and August 22, 2012 confidential filing of Adak Eagle Enterprises, LLC.

As required by paragraph 4 of the *Protective Order*, we submit: (a) one copy of the filing containing Confidential Information to the Secretary's Office along with this cover letter; (b) two copies of the filing in redacted form to the Secretary's Office along with this cover letter; and (c) two copies of the filing containing Confidential Information to Lynne Hewitt Engledow along with this cover letter. We will also file a copy of the redacted version via ECFS.

Sincerely,

John T. Nakahata
Counsel to General Communication, Inc.

WILTSHIRE & GRANNIS LLP

September 11, 2012

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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; *Universal Service Reform—Mobility Fund,* WT Docket No. 10-208; *Petition for Waiver of Windy City Cellular, LLC*; *Petition for Waiver of Adak Eagle Enterprises, LLC*

Dear Ms. Dortch:

General Communication, Inc. ('GCI") hereby responds to Adak Eagle Enterprises, LLC's ("AEE") and Windy City Cellular, LLC's ("Windy City") ex parte letter of September 4, 2012.[1] Putting aside the false mudslinging, AEE's and Windy City's latest filings lack economic logic and do little to advance their waiver petitions, which request more than three times (in the case of Windy City) or fewer (in the case of AEE) the per-line support that GCI receives. The waiver process should not be a tool to extract a competitive advantage for one family of ETCs—AEE and Windy City—at the expense of another ETC—GCI—serving the same area.

Windy City

As an initial matter, Windy City seems to acknowledge that waiver support for an upgrade to 3G would preempt the Mobility Fund /Tribal Mobility Fund processes.[2] Granting funds to Windy City to build out 3G on a sole-source basis would foreclose participation by other carriers and render irrelevant the competitive bidding process. Windy City also appears to recognize that its waiver request should stand on its own, rather than being bootstrapped to AEE's.[3]

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1 *See* Letter from Monica Desai, Counsel, Adak Eagle Enterprises, LLC and Windy City Cellular, LLC, to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 10-90 et al (filed Sept. 4, 2012)("AEE/Windy City September 4, 2012 Ex Parte").

2 *See* AEE/Windy City September 4, 2012 Ex Parte at 5.

3 *See id.* at 7. Of course, any positive cash flow that Windy City might generate would properly be considered with respect to AEE's waiver petition.

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In its August 29 Ex Parte Letter,[4] GCI set out a principled framework for how that Commission should consider a waiver sought by one ETC (here, Windy City) when another ETC of the same type (GCI) is not seeking the same waiver. This framework was drawn from the five goals articulated in the Commission's *USF/ICC Transformation Order*:[5]

> "(1) preserve and advance universal availability of voice service; (2) ensure universal availability of modern networks capable of providing voice and broadband service to homes, businesses, and community anchor institutions; (3) ensure universal availability of modern networks capable of providing mobile voice and broadband service where Americans live, work, and travel; (4) ensure that rates are reasonably comparable in all regions of the nation, for voice as well as broadband services; and (5) minimize the universal service contribution burden on consumers and businesses."[6]

Recognizing that these principles balance the benefits of extending mobile voice service ("universal availability") against the costs of doing so ("contribution burden on consumers and businesses"), GCI proposed some generalized guidance:

A. Absent some unique systemic impact, a waiver is not justified in any area in which more than one ETC provides service, because the additional support increases the contribution burden without enhancing universal availability;

B. A waiver is not justified in any area in which the ETC seeking the waiver provides service but incurs little or no additional costs to do so (such as from superior spectrum propagation from a single cell site), because the additional support is not necessary to achieve the additional coverage—which is simply incidental to the provision of other service—and thus the contribution burden is unnecessary;

C. Absent some unique systemic impact, a waiver is not justified in any area in which the ETC seeking the waiver is the only ETC providing a certain type of service, if either another ETC would be willing, given the capital network facilities, to provide comparable service within the $3000 per-line high-cost support cap, because the

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4 *See* Letter from John T. Nakahata, Counsel, General Communication, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90, WT Docket No. 10-208 (filed Aug. 29, 2012)("GCI August 29, 2012 Ex Parte Letter")

5 *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform--Mobility Fund*; Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd. 17663 (2011)("*USF/ICC Transformation Order*").

6 *Id.* ¶ 48.

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additional support increases the contribution burdens, without enhancing universal availability;

D. The Commission could reasonably provider additional support on a one-time basis to cover the reasonable and prudently incurred construction and other one-time capital costs (less accumulated depreciation), with respect to an already constructed facility that may be necessary to expand service coverage, such as the White Alice Site, if the Commission found that the facility enhanced universal availability.[7]

This framework applies a market-based test—the support for which a competing ETC is willing to provide the service—to instill fiscal discipline while still achieving universal availability.

In its September 4 Ex Parte, AEE/Windy City does not address the reasonableness of applying GCI's framework where, as in Adak, two ETCs of the same type serve a given area. Instead, it attempts to justify the waiver request based on its purportedly substantial infrastructure investments in Adak, while disparaging GCI's investments as "insubstantial."[8] Moreover, AEE/Windy City does not even acknowledge that GCI's framework accounts for the costs incurred to construct the White Alice site.

Setting aside the initial construction costs for the White Alice cell site, the record does not reflect that Windy City (as opposed to AEE) made substantial investments in service that GCI did not make. Excepting the White Alice site, Windy City constructed and operated one cell site (including base station and switch), as did GCI. ****BEGIN CONFIDENTIAL****

[redacted] ****END CONFIDENTIAL**** While AEE (rather than Windy City) may be providing some facilities as regulated ILEC investment (and thus, AEE's investment may be a factor to consider with respect to AEE's request), AEE's investment should not be considered with respect to Windy City's petition. AEE's investment can support any mobile wireless provider under its tariffed rates and terms.[9] To do otherwise and grant Windy City's waiver on the basis of AEE's investment would bootstrap Windy City's waiver request to AEE's.

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7 Any such additional support, however, should be conditioned on an agreement to transfer the facilities another mobile service ETC in the event that the recipient ETC ceased providing service and to provide voice and data roaming on reasonable and nondiscriminatory terms.

8 *See* AEE/Windy City September 4, 2012 Ex Parte at 3. AEE/Windy City also ignores GCI's significant investments in Anchorage and throughout the State of Alaska that are necessary to provide service to Adak residents and that increase the reach of their service.

9 The facilities that AEE is providing to Windy City ****BEGIN CONFIDENTIAL**** [redacted] ****END CONFIDENTIAL**** *See* Letter from Jennifer Richter, Counsel, Adak Eagle Enterprises, to Marlene Dortch, Secretary, Federal Communications Commission, at Attachment 3, WC Docket Nos. 10-90 et al. (filed Aug. 22, 2012).

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Windy City's argument that GCI currently uses AEE facilities to provide wireless service is, as GCI has previously stated, a red-herring. First, as discussed above, whether or not GCI uses AEE facilities may bear on AEE's waiver request, but not on whether Windy City should receive additional support. Second, even with respect to AEE, the proper question is not whether GCI is currently using some AEE facilities, but whether GCI could provide comparable services without use of AEE facilities within some reasonable period of time. GCI has already made clear that it can do so. Moreover, Windy City's claim that AEE provides "necessary satellite equipment" for GCI wireless service is simply wrong.[10] GCI provides its wireless service through its own satellite earth station facilities and equipment.

Windy City's argument for its requested waiver really comes down to a request that it receive support for all costs it incurs, *i.e.*, to provide it with support based on a traditional rate-of-return calculation.[11] However, CETCs have never received support on a rate-of-return basis. To the contrary, CETC support within Remote Alaska to date has always been dispensed in the same way that revenue is earned in an unsubsidized competitive market—by winning the customer.[12] Windy City's argument that it would violate competitive neutrality to provide greater absolute support (but the same support per subscriber) to a carrier that serves more customers,[13] runs contrary to the operation of unsubsidized competitive markets, where participants earn greater revenue by serving more customers and decreasing costs.

Windy City questions GCI's statement that it will not let Adak "go dark" based on statements GCI's CEO made with respect to the fact that GCI altered its deployment plans in rural Alaska after the FCC issued the *USF/ICC Transformation Order*. Windy City confuses new deployments with support of existing communities. GCI is an ETC serving Adak, and thus has duties pursuant to Section 214(e) in the event that Windy City ceases operation. GCI will

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[10] *See* AEE/Windy City September 4, 2012 Ex Parte at 2.

[11] *See id.*

[12] *See* 47 C.F.R. § 54.307(e). This was also true for areas outside of Remote Alaska up until the end of 2011.

[13] *See* Windy City September 4, 2012 Ex Parte at 5. Windy City also does not explain how paying the same amount of per line support to two carriers serving the same customer in "downtown" Adak would freeze Windy City out of serving "downtown" Adak. Paying the same amount of per line support to both CETCs does not freeze either out of the market, but enables both to compete on the basis of the price and service offered to the end user. To the extent that Windy City is arguing that it must average higher costs of operating the White Alice site with lower costs of operating its "downtown" site, that is not an issue here because GCI has said that it would be willing to take over the White Alice site (or the functional equivalent) and provide service within the $3000 cap, so both carriers average costs across the larger service area, including areas served only by the White Alice site.

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abide by its legal responsibilities as an ETC, which is different that expanding into new communities where GCI is not already providing service.

Finally, Windy City's desperate attempt to portray GCI as collecting subsidies for unused handsets is false. GCI does not offer mileage promotions with respect to prepaid services, and excludes from its high cost universal service line counts all postpaid handsets in the AEE study area with no use during the applicable reporting period.[14]

The bottom line is that Windy City is requesting a waiver to receive approximately $700,000 per year in *additional* support on a recurring basis,[15] well above the one-time costs of approximately $500,000 that Windy City says that it expended to construct the White Alice site[16] and more than triple the amount of support per subscriber that GCI receives to provide its existing service and would receive to cover its recurring incremental operating costs to provide expanded service on Adak. And this would merely preserve Windy City's existing mobile voice service. Windy City has not justified any additional recurring support.

AEE

In its August 29, 2012 Ex Parte, GCI stated that AEE had failed to present an adequate public interest rationale for the additional universal service support it requests. That remains the case. As GCI pointed out, a key question is whether AEE is necessary to deliver the voice and broadband services on Adak Island. AEE does not dispute that its broadband Internet access offering is both expensive and meager: $150/month for 256 kbps down and 96 kbps up, with 3 GB included usage.[17] That makes its fiber last-mile network a very costly way to deliver voice and very low bandwidth broadband service over a bandwidth-constrained satellite middle mile. The question remains whether additional support for AEE's network is a good use of limited incremental USF dollars, given the limited service AEE provides and the service alternatives available.

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[14] AEE and Windy City also refer vaguely to large number of lines filed by GCI. *See* AEE/Windy City September 4, 2012 Ex Parte at 2 n. 5. There was one quarter for which GCI initially filed an erroneous line count of 347 lines, which was later corrected after GCI discovered the error, with the final line count at 127 lines. AEE/Windy City also comment on GCI's use of multiple study area codes (SACs), as if GCI did so to obfuscate its lines. *See id.* However, GCI began using the additional SAC at USAC's specific request to separate mobile wireless lines from wireline CETC lines.

[15] This assumes 92 lines, as reflected in the Wireless Bureau's Interim Order. *See Connect America Fund, Universal Service Reform — Mobility Fund, Petition for Waiver of Windy City Cellular, LLC*, ¶6, Order, DA 12-923, 26 FCC Rcd. 6224 (2012).

[16] *See* AEE/Windy City September 4, 2012 Ex Parte at 7.

[17] *See* Comments of General Communication, Inc., at 3 n.4, WC Docket No. 10-90, WT Docket No. 10-208 (filed July 2, 2012).

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AEE appears to understate the amount of support that is subject to the waiver.[18] Although AEE received nearly $1.2 million in HCLS disbursements in 2011, it also received $927,528 in ICLS disbursements, which are also subject to the 47 C.F.R. § 54.302 support cap. This means that, using the 2011 disbursements as the approximate base, AEE is seeking a waiver to receive an additional approximately $1.6 million annual support at full cap implementation.[19]

AEE also questions whether wireless technologies, including both CMRS and WiFi, could be used to provide voice and Internet access service on Adak, asserting, without any engineering support, that "the environment and severe weather conditions, including frequent deep snows, heavy rains and cyclonic winds on Adak Island suggest that a wireless-only service is not a viable option to provide consistent, reliable service"[20] and "[b]ecause of the cyclonic winds on Adak Island and other persistent, extreme weather conditions, a traditional wireless router is inadequate to provide Wi-Fi in Adak."[21] GCI's engineers do not believe either of these assertions to be correct. GCI has deployed CMRS and WiFi technology in extreme conditions in many locations in Alaska, including other islands in the Aleutian chain. WiFi routers can be placed in shelters adjacent to the antennas, and it is not clear from AEE's assertions what conditions it believes will interfere with CMRS service. CMRS service is not affected by wind

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[18] *See* AEE/Windy City September 4, 2012 Ex Parte at 9.

[19] This assumes 155 lines, which is what USAC has projected for the Fourth Quarter of 2012, which yields $465,000 in combined HCLS and ICLS support at the $3,000 per line annual cap. *See* USAC Appendix HC-05, Four Quarter 2012, available at: http://www.usac.org/about/tools/fcc/filings/2012/Q4/HC05%20-%20High%20Cost%20Loop%20Support%20Projected%20by%20State%20by%20Study%20Area%20–%204Q2012.xls. AEE had total 2011 HCLS and ICLS disbursements of $2,119,265. *See* USAC High Cost Disbursement Data, *available at* http://www.usac.org/hc/tools/disbursements/default.aspx. AEE 2011 HCLS and ICLS disbursements thus average approximately $13,672 per projected 4Q2012 AEE line. For 2012, ignoring the $3000 per line cap, Windy City's 2012 high cost support disbursements would be reduced from 2011 levels due to changes in corporate operations expense limits for HCLS, and the extension of those limits to ICLS. However, GCI estimates the impact of those changes at only approximately $50,000. These numbers are lower than in GCI's August 29, 2012 Ex Parte (at 7-8), because that ex parte mistakenly included the $559,000 in Local Switching Support ("LSS") that AEE received in 2011. LSS has now been merged into the Intercarrier Compensation Replacement Support being distributed from the Connect America Fund ("CAF") pursuant to 47 C.F.R. § 54.304. GCI projects that AEE will still receive the bulk of its former LSS support through the CAF Intercarrier Compensation Replacement Support mechanism. The additional support under the waiver per occupied or seasonally occupied housing unit would then be $21,484 per year, rather than $28,600.

[20] AEE/Windy City September 4, 2012 Ex Parte at 9.

[21] *Id.* at 8.

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or snow depth (which only averages a few inches in winter months). Notably, Adak does not have a lot of trees, which are a more frequent problem for wireless services. In addition, AEE appears to be overstating the climatological differences between Adak and Dutch Harbor: both have similar average temperatures, total precipitation, total snowfall, and snow depth, and both are afflicted by very high winds.[22]

Adak does not deny that its corporate operations expense are a staggering ****BEGIN CONFIDENTIAL**** [redacted] ****END CONFIDENTIAL**** of its total operating expenses. AEE's claim that its "high costs are reflective of the expenses necessarily incurred by the company to build out the network on Adak Island on its own" attempts to shift the focus from its corporate operations expense to its plant expenses, and thus is a non-sequitur.[23] Moreover, even if its wage and hour rates are in line with statewide schedules,[24] AEE still can be, and is, an inefficiently sub-scale operation. Compared with larger companies, AEE simply has too few lines over which to spread its overhead. Moreover, GCI is not AEE's only alternative for addressing scale, as AEE suggests.[25] AEE could address its scale issues by, for example, consolidating with other ILECs to spread the corporate overhead over a much larger base of operations.

GCI did not argue that Adak Island should be forced to abandon its wireline service,[26] but it does question whether continued support of the wireline network is the most efficient way to assure the delivery of voice and broadband services on Adak Island. If it is not efficient, with specific and demonstrable service-related benefits, then the mere fact that investment historically was sunk into the wireline network does not by itself justify providing continued, additional support dollars to the operator of that network. From a public interest perspective, would it be better to spend $1.6 million per year on providing wireline service that is equivalent to service that could be delivered wirelessly without the incremental support, or to spend that $1.6 million per year, for example, to enable deployment of mobile wireless service to another rural Alaska community that has none?[27]

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22 *See* Exhibit A, attached. *See also, e.g.,* Anchorage Daily News, "High Winds Topple Tall Crane in Dutch Harbor" (December 5, 2009)(discussing the effect of 125 mph winds in Dutch Harbor), *available at*: http://www.adn.com/2009/12/05/1042218/high-winds-topple-tall-crane-at.html (last accessed Sept. 10, 2012).

23 AEE/Windy City September 4, 2012 Ex Parte at 8.

24 *See id.*

25 *See id.*

26 *See id.* at 9.

27 GCI also did not argue that the Commission should understand the location of AEE's multiline businesses, but simply observed that it is likely that the multiline businesses are all within a relatively compact geographic area.

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It should also be noted that the five projects that AEE states, in its August 27, 2012 Ex Parte, that it cannot complete until it knows whether it will receive waivers of caps on universal service funding from the Commission[28] do not justify providing additional support under the HCLS or ICLS support mechanisms, because none of the projects supports the deployment of common line loops. HCLS supports unseparated loop costs, which are defined as costs in support of Cable & Wire Facilities (C&WF) Subcategory 1.3 loop investment and Central Office Category 4.13 investment in other circuit equipment.[29] Neither of these categories includes dedicated private line (or special access) circuits, which are apportioned into C&WF Subcategories 1.1 and 1.2, or end office switching costs.[30] CW&F Subcategory 1.3 consists only of costs related to "subscriber or common lines that are jointly used for local exchange service and exchange access for state and intestate interexchange services."[31] Similarly, ICLS provides support only for that portion of the interstate Common Line Revenue Requirement per Study Area that cannot be recovered through end user common line charges, special access surcharges, and line ports in excess of basic—which also does not recover costs associated with special access or switching.[32] Of the five projects listed in AEE's August 27, 2012 Ex Parte: one is a software update for customer service and switching; two are special access private lines for the University of Alaska and a Conoco Phillips contractor, respectively; and two appear to be special access circuits to support WiFi-based Internet access.[33] As such, none can support increased HCLS or ICLS support.

It is notable that at least two of these projects—a fiber line for the University of Alaska to monitor weather activity in the Aleutian Islands and a fiber line to a Conoco Phillips logistics support terminal, and possibly the backhaul for the WiFi broadband to serve the north side of Adak Island—appear to be projects that would be subject to special construction charges pursuant to NECA's FCC Access Tariff No. 3, in which AEE participates, or, if jurisdictionally intrastate, line extension charges under Adak's local exchange service tariff.[34] As such, these

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[28] *See* Letter from Jennifer Richter, Counsel, Adak Eagle Enterprises, to Marlene Dortch, Secretary, Federal Communications Commission, at 3, WC Docket Nos. 10-90 et al (filed Aug. 27, 2012) ("AEE August 27, 2012 Ex Parte").

[29] *See* 47 C.F.R. § 36.621 (defining the study area total unseparated loop cost).

[30] *See* 47 C.F.R. § 36.154(a)(defining C&WF Subcategories 1.1 and 1.2); *see also* 47 C.F.R. § 36.126(defining Category 4.13 as excluding switching equipment).

[31] 47 C.F.R. § 36.154(a).

[32] *See* 47 C.F.R. § 54.901(a).

[33] *See* AEE August 27, 2012 Ex Parte at 2.

[34] *See e.g.* National Exchange Carrier Association, Inc. Access Service Tariff F.C.C. No. 3, § 2.6.4(E)(2), at https://www.neca.org/cms400min/NECA_Templates/PublicInterior.aspx?id=3416 (last accessed Sept. 10, 2012); *see also* Adak Eagle Enterprises d/b/a Adak Telephone Utility, RCA Tariff No. 1, §§ 7.08, 7.14, 8.08 (filed April 22, 2008) *available at*

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facilities are subject to additional charges to recover the costs of construction, rather than supporting this construction through additional subsidies. AEE also does not factor these additional charges into its claims.

* * *

Accordingly, neither Windy City nor AEE has justified the waivers of the annual study area per line high cost support caps in 47 C.F.R. §§ 54.307 and 54.302, respectively, that they request.

Please contact me if you have any questions.

Sincerely,

John T. Nakahata
Counsel for General Communication, Inc.

cc: Michael Steffen
Christine Kurth
Angela Kronenberg
Louis Peraertz
Matthew Berry
Courtney Reinhard
Paul Murray
Priscilla Delgado Argeris
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Julie Veach
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Patrick Halley
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Pramesh Jobanputra
Sue McNeil
Mark Rossetti
Gary Seigel
Margaret Wiener

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http://rca.alaska.gov/RCAWeb/ViewFile.aspx?id=3684f29f-d19e-442e-b467-0e10fa9ad874 (establishing additional charges for service when the cost of a line extension/special construction exceeds seven time the annual revenue from that customer).

EXHIBIT A

Monthly Climate Summaries
Dutch Harbor and Adak, Alaska

ADAK, ALASKA (500026)

Period of Record Monthly Climate Summary

Period of Record : 9/ 1/1949 to 12/31/2005

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Average Max. Temperature (F)	37.2	37	38.6	41.3	45.1	49.1	54	55.8	52.3	46.9	41.4	38	44.7
Average Min. Temperature (F)	28.9	28.5	30.1	32.9	36.6	40.8	44.7	46.6	43.6	38.2	33	29.9	36.2
Average Total Precipitation (in.)	6.27	4.57	5.43	4.19	3.86	3.09	2.82	4.22	5.78	6.56	7.43	7.28	61.5
Average Total SnowFall (in.)	18.1	18.4	20.1	10	1.5	0	0	0	0.1	1.5	10.4	19.3	99.4
Average Snow Depth (in.)	2	3	2	0	0	0	0	0	0	0	0	1	1

Percent of possible observations for period of record.
Max. Temp.: 85.5% Min. Temp.: 85.5% Precipitation: 85.8% Snowfall: 84.6% Snow Depth: 83.9%

Data from the Western Regional Climate Center, available at: http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ak2587 (Dutch Harbor) and http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?akadak (Adak)

DUTCH HARBOR, ALASKA (502587)

Period of Record Monthly Climate Summary

Period of Record : 1/ 1/1951 to 8/21/2012

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Average Max. Temperature (F)	36.7	37.4	38.5	40.8	46	51.5	56.8	58.8	54	47.3	42.5	39	45.8
Average Min. Temperature (F)	28	27.8	28.2	31.4	36.7	41.8	45.9	47.7	43.5	37.3	32.1	30.3	35.9
Average Total Precipitation (in.)	7.13	6.2	5.25	3.42	3.98	2.5	2.21	2.69	5.42	7.09	6.66	7.9	60.45
Average Total SnowFall (in.)	23.8	19.6	16.8	6.8	0.2	0	0	0	0	0.5	7.1	17.4	92.3
Average Snow Depth (in.)	4	5	4	1	0	0	0	0	0	0	0	3	1

Percent of possible observations for period of record.

Max. Temp.: 41.4% Min. Temp.: 41.3% Precipitation: 41.3% Snowfall: 41.1% Snow Depth: 38.1%

Data from the Western Regional Climate Center, available at: http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ak2587 (Dutch Harbor) and http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?akadak (Adak)