



Law Offices of Bennet & Bennet, PLLC

Maryland

6124 MacArthur Boulevard
Bethesda, Maryland 20816
Tel: (202) 371-1500
Fax: (202) 371-1558
www.bennetlaw.com

District of Columbia

10 G Street, NE, Suite 710
Washington, DC 20002

Caressa D. Bennet
Michael R. Bennet
Marjorie G. Spivak*
Kenneth C. Johnson‡

* Admitted in DC & PA Only
‡Admitted in DC & VA Only

Howard S. Shapiro
Daryl A. Zakov^
Robert A. Silverman
Anthony K. Veach#

^Admitted in DC & WA Only
#Admitted in DC & FL Only

October 1, 2012

Via Hand Delivery

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

**Re: Petition for Waiver of Cordova Wireless Communications, Inc.;
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 a 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**

Dear Ms. Dortch:

Enclosed for filing in the above-referenced dockets is the Petition for Waiver of Cordova Wireless Communications, Inc. ("Cordova"). Cordova seeks a waiver of Section 54.307(e)(3)(iv) of the rules of the Federal Communications Commission ("Commission").

As detailed in the enclosed Request for Confidential Treatment, Cordova requests that the Commission treat as confidential parts of the petition and supporting exhibits that contain confidential and proprietary information. Accordingly, Cordova submits two (2) versions of the petition and supporting exhibits: (1) a non-redacted version that contains confidential and proprietary information; and (2) a redacted version for public inspection. Cordova requests that the Commission treat the non-redacted version and the accompanying documents confidentially.

October 1, 2012
Page 2 of 2

Please contact the undersigned with any questions.

Sincerely,



Michael R. Bennet
Counsel for Cordova Wireless Communications, Inc.

Enclosures

cc: Julie Veach
Carol Matthey

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
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PETITION FOR WAIVER OF CORDOVA WIRELESS COMMUNICATIONS, INC.

Michael R. Bennet
Kenneth C. Johnson
Bennet & Bennet, PLLC
6124 MacArthur Boulevard
Bethesda, MD 20816
(202) 371-1500

Counsel to Cordova Wireless Communications, Inc.

Date: October 1, 2012

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SUMMARY

Cordova Wireless Communications, Inc. (“Cordova”) seeks a waiver of Section 54.307 of the Federal Communications Commission’s Rules so that Cordova’s high cost support is not reduced below [REDACTED] of its baseline level of high cost support. Cordova operates in an exceptionally high cost area. Its rural Alaskan service territory covers harsh terrain and its largely inaccessible transmitter sites, which are difficult to reach under the best of circumstances, are impossible to reach during Alaska’s lengthy, harsh, and dark winters. If Cordova’s high cost universal support is reduced below [REDACTED] of its baseline level, Cordova will have no alternative but to terminate all wireless operations. As a result, the many Native Alaskan villagers and other residents and individuals travelling through the remote Yakutat territory served by Cordova will lose voice service. The termination of Cordova wireless service will also result in the loss of voice service in a substantial portion of the remainder of Cordova’s service territory and the loss of GSM service through virtually the entirety of Cordova’s service area.

Cordova satisfies the standards for waiver set out in the *USF/ICC Transformation Order* and the FCC’s Rules. Cordova needs to maintain at least [REDACTED] of its current level of support in order for its customers to continue receiving voice service in areas where there is no terrestrial alternative. In approximately [REDACTED] of Cordova’s service area, the reduction in support anticipated by Sections 54.307(e)(3)(iv)(B)-(E) of the FCC’s Rules will result in the loss of voice service where there are no alternative terrestrial providers available to provide voice telephony service using the same or other technologies that provide the functionalities required for supported voice service. Grant of the requested waiver will serve the public interest. Absent such waiver, public safety and welfare will be jeopardized by the resulting loss of voice service and mobile access to emergency services in a remote and inhospitable territory where mobile

telephone service is often the only lifeline available. Grant of the requested waiver is consistent with the underlying purpose of the FCC Rule Section 54.307 and Section 254 of the Communications Act, and Cordova has no reasonable alternative but to seek the requested waiver.

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
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Connect America Fund)	WC Docket No. 10-90
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Universal Service Reform – Mobility Fund)	WT Docket No. 10-208

PETITION FOR WAIVER OF CORDOVA WIRELESS COMMUNICATIONS, INC.

Cordova Wireless Communications, Inc. (“Cordova”), by its attorneys and pursuant to Section 1.3 of the Federal Communications Commission’s (“FCC” or “Commission”) Rules and Regulations, and the Commission’s *USF/ICC Transformation Order*¹ hereby seeks waiver of Section 54.307(e)(3)(iv) of the FCC’s Rules. Specifically, Cordova requests that the

¹ *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 an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and link-Up, Universal Service Reform – Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“USF/ICC Transformation Order”).*

Commission waive Sections 54.307(e)(3)(iv)(B)-(E) of the FCC's Rules so that Cordova's high cost support is not reduced below [REDACTED] of its baseline level of high cost support.² The ability of Cordova to continue to receive [REDACTED] of its baseline level of support is vital to allow it to provide service to currently unserved area and to continue to provide mobile voice service and cellular data to the individuals and businesses who live, work and travel in a large portion of the remote and isolated Alaskan territory area that is served only by Cordova. If a waiver is not granted, Cordova customers and those customers of other GSM carriers roaming through Cordova's large and isolated service territory will lose voice service and roaming ability outside the downtown area. Critical services, government operations and public safety will also be jeopardized.

I. Introduction

Cordova provides wireless telecommunications service in a rural Alaskan service area that is both remote and extremely challenging to serve, containing mountains, water and islands that make its facilities difficult to reach even in the optimal months of the year and next to impossible during the harsh Alaskan winter. The service Cordova provides is essential to those who live, work and travel through Cordova's service territory and the 911 access it provides is vital to the health and safety of the many hikers, fisherman and others who travel long distances outside of the downtown area and who rely on wireless service as a lifeline to potential assistance in emergencies. Due to the location of these individuals and the severe weather, the availability of 911 service equates literally to a matter of life and death.

In July, Cordova began to serve additional area in Yakutat, a small community³ so isolated that it is reachable only by air or by boat. At the request of the Borough of Yakutat,

² In 2011, Cordova received [REDACTED] in high cost support.

³ Yakutat has a year round population of 662, which swells to approximately 1,500 during the summer months.

where over one third of the population is Alaskan Natives,⁴ Cordova volunteered to provide service because no other carrier, including those licensed to serve Yakutat, had done so.

Cordova was certified as an ETC by the Regulatory Commission of Alaska on September 15, 2006. The Regulatory Commission of Alaska determined that designating Cordova as an ETC serves the public interest, noting that Cordova is “the only provider of wireless services in some locations” and that it will provide “access to essential emergency services.”⁵ The public interest benefits of the wireless service provided by Cordova remain unchanged and have increased due to Cordova’s network expansion. Such benefits will spread even further once Cordova completes its additional network expansion, completion of which is contingent on grant of the requested waiver.

II. Statement of Facts

Cordova provides below the specific factual information dictated by the *USF/ICC Transformation Order*.

A. Density Characteristics

1. Alaska RSA 2

Cordova operates in one of the most challenging environments in the United States. The rural Alaskan service area in Alaska RSA 2 (Bethel, CMA316(A))⁶ that Cordova presently

⁴ According to the 2010 U.S. Census, 35.6% of Yakutat is American Indian/Alaskan Native. See <http://quickfacts.census.gov/qfd/states/02/02282.html>.

⁵ *In the Matter of the Application by Cordova Wireless Communications, Inc. for Designation as a Carrier Eligible to Receive Federal Universal Service Support Under the Telecommunications Act of 1996*, Order Approving Application for Eligible Telecommunications Carrier Status, and Requiring Filings, U-06-59, Order No. 2, Regulatory Commission of Alaska, Sept. 15, 2006.

⁶ Cordova’s RSA2 service area is sometimes referred to herein as the Cordova service area to distinguish it from Cordova’s Yakutat service area. Although Cordova’s Yakutat service area is licensed as part of Cordova’s RSA 2 license, prior to licensing, it was unserved area located in Alaska RSA 3 (Haines). For purposes of discussion herein, the Yakutat service area is described as located in Alaska RSA 3. The density data provided herein for RSA 2 does not include data

serves covers 9,093 square miles, but only 255 road miles, and is spread out over remote, mountainous and inhospitable terrain, including the Chugach mountain range, Chugach National Forest and Childs Glacier.⁷ In this area, Cordova serves approximately [REDACTED] subscribers and [REDACTED] subscribers per square mile. As seen by the maps attached as Exhibit A, much of this service area consists of water and islands in Prince William Sound and the Gulf of Alaska. Much of the traffic carried by Cordova is not land-based and serves a variety of maritime users, including commercial fishermen, sports fishermen, recreational boaters, cruise ships and oil tankers. Of the 255 miles of roads in Cordova’s RSA 2 coverage area, the vast majority are unpaved and unusable for much of the year. In this area, Cordova serves nine subscribers per road mile. Among the challenges faced by Cordova are the inaccessibility of its transmitter sites and a very short construction season due to extreme weather conditions and short daylight hours in winter. Several of its transmitter sites are located on rugged and steep mountainsides, accessible only by helicopter. Yet another can only be reached by ski lift or helicopter. Transporting hundreds to thousands of pounds of equipment to these sites is extremely difficult and the expense of accessing these sites, even for routine maintenance, is substantial (over [REDACTED] per year to access three of the most hard to reach sites). Moreover, due to weather

for Yakutat, which was only recently licensed and does not yet have ETC status. Density data for Yakutat is provided separately below.

⁷ This is the combined area and road miles for Cordova’s licensed service area and the area it actually serves. For the other geographical areas for which the Commission seeks density data (*see USF/ICC Transformation Order* at ¶542), the density data is as follows: (1) the area in which Cordova is licensed to serve: 5,402 square miles; 254 road miles; (2) the area in which Cordova actually provides service: 7,807 square miles; 255 road miles; (3) the area in which Cordova is designated as a CETC: 2,214 square miles; 291 road miles); and (4) the area in which Cordova is the sole provider of mobile service: 3,295 square miles. The area in which Cordova is the sole provider of mobile service does not cover any road miles; however, it covers land, including the majority of Montague Island, the 26th largest island in the United States. As discussed below, the water-based traffic carried by Cordova is significant and critical from a public safety perspective. Moreover, the area in which Cordova is the *sole provider of GSM service* is 7,555 square miles and 144 road miles.

conditions, these sites are completely inaccessible for large portions of the year.⁸ In addition to the difficulty of reaching these sites, it frequently takes well over an hour to dig out snow to even enter the equipment shelters located at these sites. Due to the paucity of passable roads and the limited driving season, transportation of fuel, equipment and personnel is both expensive and difficult.

2. Alaska RSA 3

Cordova's Yakutat service area, licensed as part of its Alaska RSA 2 service area, is previously unserved area located in Alaska RSA 3 (Haines, CMA317) and covers 547 square miles of the isolated Yakutat Bay and Yakutat Valley region, but only 113 road miles. The Borough of Yakutat has a population of 662, one third of which are Alaskan Natives. Yakutat is one of the most isolated communities in the United States. Yakutat has no road access and is reachable only by air and boat.⁹ Yakutat is located approximately 217 miles southeast of Cordova, Alaska and approximately 225 miles northwest of Juneau, Alaska, with little to no population in between. It is bordered on the east by glaciers and the Canadian Rockies and on the west by the Gulf of Alaska and Pacific Ocean.

3. Scalability and Backhaul

Lack of scalability is not an applicable issue for Cordova. While Cordova has scalable equipment, the population size of its community is too small for Cordova to take advantage of such scalability. For these same reasons, and because of the large geographic separation between

⁸ The average annual snowfall in Cordova, Alaska is approximately 100 inches, with snow covering the ground for almost half the year. This winter Cordova received almost 35 feet of snow. Pictures of Cordova's snow covered tower sites, which illustrate the extreme nature of the weather conditions faced by Cordova, are attached hereto as Exhibit B.

⁹ Goods are delivered by barge monthly in winter and more frequently in summer.

the two communities, scalability provides no cost savings or benefit to Cordova’s ability to serve Yakutat.

Last year, Cordova addressed its backhaul availability issues in RSA 2 through [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] In Yakutat, satellite backhaul is available only from AT&T.

Additional information on Cordova, Alaska and Yakutat, Alaska is set forth in Exhibit C.

B. Alternate Providers

There are two providers of wireless voice telephone service in Cordova’s RSA 2 service territory. Copper Valley Wireless (“Copper Valley”) offers CDMA service in a large portion of Cordova’s service area. GCI (“GCI”) offers GSM service in a very small portion of Cordova’s service area. Copper Valley offers broadband service in a limited portion of Cordova’s service area. GCI does not offer broadband service in Cordova’s service area.

There are no providers of wireless voice telephone or non-satellite broadband service in either the current Yakutat service area or the area of proposed expansion.

C. Corporate Operations Expenses

Corporate operations expenses for 2011 are as follows:

[REDACTED]

D. Rate Plans

Cordova's rate plans are attached as Exhibit D.

E. Non-Voice Services

Cordova offers data service at speeds in excess of 3G. [REDACTED]

[REDACTED]

F. Financial Statements

Attached as Exhibit E are audited financial statements for 2009, 2010 and 2011 for Cordova and CTC.

G. Loans

Loan information is contained in the financial statements attached as Exhibit E.

H. Decommissioned Facilities

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I. Maps

Maps depicting the area that Cordova is licensed to serve, the area in which it actually provides service, the area in which it is designated as a CETC, and the area in which it is the sole provider of mobile service, and the location of each cell site are attached as Exhibits A and F.

J. Sole Provider

Cordova is the only provider of mobile service in its Yakutat service area and in a significant portion of its Cordova wireless service area. Drive test data demonstrating that Cordova is the sole provider in a significant portion of its Cordova wireless service area is attached as Exhibit F. [REDACTED]

The testing methodology was as follows. A Cordova employee drove to various locations in the land based portion of its Cordova service area and made ten test calls using a phone subscribed to each of the three carriers at each location, recording the results. Ten calls were made at each location using a phone subscribed to each of Cordova (i-Phone 4S transmitting on 850 MHz GSM), GCI (Nokia Model E5-00 transmitting on 1900 MHz GSM) and Copper Valley (Samsung Admire, Model SCH-r720 transmitting on 850B CDMA).

K. Revenue and Expense Data

Revenue and expense data for each cell site for the three most recent fiscal years is attached as Exhibit H.

L. Projected Revenue and Expenses

Projected revenues and expenses, on a cell site basis, for five years, with¹¹ and without¹² the waiver sought, are attached as Exhibit I.

¹⁰ Marketing data from Copper Valley and GCI, attached as Exhibit G, support the drive test results.

¹¹ Projections based on grant of the waiver are characterized as “With Waiver”.

¹² Projections based on no waiver are characterized as “Without Waiver”.

III. A Waiver of 54.307(e)(3)(iv) is Warranted

Cordova satisfies the Commission’s waiver criteria. In its *USF/ICC Transformation Order*, the FCC describes the standard which it will use to evaluate requests for waiver of provisions of that Order:

Waiver would be warranted where an ETC can demonstrate that, without additional universal service funding, its support would not be ‘sufficient to achieve the purposes of [section 254 of the Act].’ In particular, a carrier seeking such waiver must demonstrate that it needs additional support in order for its customers to continue receiving voice service in areas where there is no terrestrial alternative. We envision granting relief only in those circumstances in which the petitioner can demonstrate that the reduction in existing high-cost support would put consumers at risk of losing voice services, with no alternative terrestrial providers available to provide voice telephony service using the same or other technologies that provide the functionalities required for supported voice service.”¹³

Without a waiver allowing Cordova to continue to receive at least █████ of its existing level of high cost support, consumers of wireless voice telecommunications services in Cordova’s service territory will ultimately lose the ability to make wireless voice telephone calls. Due to the unusually high costs associated with providing wireless telecommunications service in Cordova’s remote and geographically challenging service area, Cordova relies heavily on universal service support to cover the costs of maintaining and operating its wireless network in such an inhospitable environment. If the requested waiver is not granted, and amount of such support is reduced and phased out pursuant to the FCC’s new rules, Cordova will be forced to immediately terminate service to Yakutat¹⁴ and will be unable to continue to provide service to any point on its network past July 1, 2016, at which point it will have to terminate all wireless operations. The loss of service to Yakutat will deprive *all* residents (many of which are Native

¹³ *USF/ICC Transformation Order* at ¶ 540 (quoting 47 U.S.C. § 254(e)).

¹⁴ Although Cordova only recently obtained a license to serve Yakutat, and therefore is not yet an ETC in Yakutat, it is filing contemporaneously herewith a petition for ETC designation with the Regulatory Commission of Alaska for a redefined service area that includes Yakutat, and expects to have ETC status in Yakutat before the Commission rules on the instant petition.

Alaskan villagers) and individuals travelling in Yakutat of wireless voice service, while the loss of all Cordova wireless service will result in the loss of all wireless service in a significant portion of Cordova’s service area and the loss of GSM service through virtually the entirety of Cordova’s service area.¹⁵ Although wireless customers in a large portion of Cordova’s service area will still be able to avail themselves of wireless service by taking service from Copper Valley, such service will only work for customers with CDMA handsets. For GSM customers, including all customers of AT&T and all other GSM roamers, GSM service to Prince William Sound as well as all but [REDACTED] of Cordova’s service area (and all of Cordova’s service area outside of the city limits of the town of Cordova) would be unavailable and such customers would be unable to make or receive any voice calls, including calls to 911, if Cordova is forced by an adverse waiver decision to exit the market. Accordingly, in approximately [REDACTED] percent of Cordova’s service area, there are “no alternative terrestrial providers available to provide voice telephony service using the same or other technologies that provide the functionalities required for supported voice service.” The circumstances faced by Cordova are thus exactly those identified by the *USF/ICC Transformation Order* as supporting grant of a waiver.

In addition to Cordova’s satisfaction of the waiver criteria established by the *USF/ICC Transformation Order*, there is good cause for grant of the requested waiver.¹⁶ The wireless telecommunications service provided by Cordova is critical to the economic and personal health and safety of the residents and fishermen who rely on such communications to navigate and survive in the remote and extremely isolated territory of rural Alaska that Cordova has chosen to

¹⁵ In the *USF/ICC Transformation Order*, the Commission noted that in evaluating waiver requests, it “will consider as a factor specific showings regarding the impact on customers, including roaming customers, if a petitioner is the only provider of CDMA or GSM coverage in the affected area.” *USF/ICC Transformation Order* at ¶ 540.

¹⁶ 47 C.F.R. §1.3; *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

serve, an area which few carriers are even willing to attempt to provide service to. Public safety and homeland security interests are highly dependent on the service provided by Cordova.

Among the individuals and business that rely on Cordova's service for personal, business and emergency communications are the Federal Aviation Administration and its personnel, the local fishing fleet of approximately 800 boats, tourist traffic in Prince William Sound, the cruise ship industry, oil tankers, local hunters and gatherers (both Native and non-native groups), privately owned cabins, the U.S. Coast Guard, Alaska State troopers, the Alaska Department of Fish and Game, the United States Forest Service and local police.

In Cordova's rugged rural service territory, individuals are particularly vulnerable to the loss of communications service. Prior to Cordova's construction of its Naked Island site, and consequent extension of its coverage area to Prince William Sound, numerous fisherman lost their lives when their boats sank and they were unable to call to shore for help. Hikers in the treacherous Alaskan wilderness also lost their lives when they were unable to use their phones to call for help. Hikers are typically at the mercy of the large population of bears in the forests around Cordova. For such individuals to lose the ability to access 911 and other voice communications services will jeopardize lives and safety, and is clearly contrary to the public interest.

As the only mobile service available in one of the most isolated areas in the United States, the service provided by Cordova in the Yakutat Valley is even more critical to residents and roamers in that territory. In addition to Yakutat residents and those travelling through the Yakutat wilderness, those relying on Cordova service include local police and first responders, State Troopers, the Alaska Department of Fish and Game, National Park Service, U.S. Forestry Service, Transportation Security Administration, Yakutat Airport, the Native Corporations,

including the Yakutat Tlingit Tribe Council, and recreational and subsistence hunters and fishermen. To deprive such entities of the only available mobile wireless service would be contrary to the public interest. Although Cordova does not yet have ETC status for its Yakutat service area, it is critical that the Commission rule on Cordova's request now to afford Cordova some degree of certainty with respect to its investment decisions. Cordova cannot make prudent decisions as to whether to invest in additional construction of its high cost Yakutat network without knowing the extent of available federal high cost support.

It is in the public interest for Cordova to continue expanding its ETC footprint into the Yakutat area. With support being phased down, Cordova will have to delay or deny much-needed mobile service to additional portions of Yakutat. It is not in the public interest for Cordova to simply wait for Mobility Fund Phase II given the vital nature of mobile services in Alaska, the speculative nature of such support, and the critical need for lead time to complete the planned network expansion.¹⁷

Cordova is faced with unusually high costs in order to provide service to its challenging service territory. Its transmitter sites are difficult to reach, accessible in some cases only by boat, helicopter or ski lift. Even upon reaching these sites, extensive snow removal is often required to actually access the site for necessary maintenance. Due to unusually hard weather conditions (Cordova experienced 35 feet of snow this winter), Cordova's transmitter sites are completely inaccessible for large portions of the year. The paucity of passable roads, the distance between transmitter sites and limited driving season raises the costs of transportation, fuel, equipment and personnel substantially above transmitter access costs for other carriers. For example, Cordova must incur expenses of over [REDACTED] per year merely to access three of its most difficult to

¹⁷ Cordova recognizes that any funding received through Mobility Fund Phase II may minimize the extent and duration of the waiver needed by Cordova.

provided in urban areas and that are available at rates that are reasonably comparable to rates charges for similar services in urban areas.”²¹ As discussed above, grant of the requested waiver is essential to ensuring the continued and future availability of mobile voice service to most of those residing in and travelling through Cordova’s service territory, including all individuals requiring mobile voice service outside of the town of Cordova and all GSM roamers throughout virtually the entirety of Cordova’s licensed service area. Moreover, the only way to ensure that the rates charged by Cordova are reasonably comparable to those charged for similar services in urban areas is to continue to allow Cordova to receive at least [REDACTED] of its current level of universal service support. Absent at least [REDACTED] of such support, Cordova would be forced to raise its rates to an unaffordable and noncompetitive level, effectively ensuring its departure from the market. Similarly, in the *USF/ICC Transformation Order*, the Commission recognized the unique challenges faced by carriers serving insular areas in Alaska and accordingly delayed the implementation of its phase out of ETC support for such carriers. Waiver here is consistent with the intent of the FCC in establishing a waiver process that recognizes that carriers with such “special circumstances”²² may warrant specialized relief. Waiver is also consistent with the Commission’s “obligation to consumers . . . to ensure that they receive supported services”²³

Grant of the requested waiver is consistent with the Commission’s expectation that “Waiver would be warranted where an ETC can demonstrate that, without additional universal service funding, its support would not be ‘sufficient to achieve the purposes of [section 254 of

²¹ 47 U.S.C. §254(b)(3).

²² See, e.g., *USF/ICC Transformation Order* at ¶ 508 (referencing the “special circumstances” of places like Alaska, “such as its remoteness, lack of roads, challenges and costs associated with transporting fuel, lack of scalability per community, satellite and backhaul availability, extreme weather conditions, challenging topography, and short construction season.”).

²³ *USF/ICC Transformation Order* at ¶ 222.

the Act].”²⁴ Section 254 requires that high-cost support be sufficient and to ensure that rural consumers have access to similar services offered in urban areas of the country.²⁵ With the loss in high-cost support leading to scaled-back plans for expansion into unserved areas and the eventual shutdown of service in currently served areas, the phase down of support is contrary to the clear mandate of Section 254 of the Act.

Cordova has no reasonable alternative but to ask for the requested relief. Cordova cannot reduce its costs further than projected. [REDACTED]

[REDACTED] and has reduced its costs to the maximum extent feasible. Cordova cannot raise its rates and still remain competitive. Indeed, the cost to each customer of the wireless service offered by Cordova would have to increase by [REDACTED] per month just to cover Cordova’s operating expenses as the result of a 40% loss of high cost support. Such an increase would not only be unaffordable for many of Cordova’s customers in violation of Section 254(b)(1) of the Act, it would also result in rates that are not reasonably comparable to rates charged for similar services in urban areas, in violation of Section 254(b)(3) of the Act. Cordova is ineligible to obtain any grant money. [REDACTED]

The circumstances faced by Cordova are similar to those faced by Allband Communications Cooperative (“Allband”), a carrier that was recently granted a waiver of various high cost universal service rules.²⁶ Like Allband, Cordova “serves a remote, heavily forested and unserved area.”²⁷ Like Allband, it’s “service territory is difficult to serve and has

²⁴ *USF/ICC Transformation Order* at ¶ 540.

²⁵ 47 C.F.R. § 254(b)(3).

²⁶ *Allband Communications Cooperative Petition for Waiver of Certain High-Cost Universal Service Rules*, Order, WC Docket No. 10-90 (WCB, rel. July 25, 2012).

²⁷ *Id.* at par. 11.

very few customers.”²⁸ Like Allband, the management of Cordova “is mindful of its expenses and limited financial resources given the size of its business” and the salaries and wages of its few employees “are modest.”²⁹ And like Allband, “given the low population density in [its] service territory,” Cordova “also will not be in a position to increase its revenues from consumers in the short-term.”³⁰

Cordova cannot reasonably be expected to make decisions as to whether to make substantial investment in its network without knowing the extent of available high cost support.

[REDACTED]

[REDACTED]

[REDACTED]

As demonstrated above, good cause exists for grant of the requested waiver. Cordova requires support beyond that allowed by the new rules in order for Cordova’s customers to continue receiving voice services in the vast majority of Cordova’s service territory in which there is no terrestrial alternative and in order for others in need of GSM wireless service in Cordova’s service territory to have access to such services. In view of the unusual factual circumstances of Cordova’s high cost and challenging rural Alaskan service environment, strict application of the phase out of universal service support to Cordova would be inequitable and unduly burdensome, and in light of the impact on Cordova’s customers and GSM roamers that may require service, including emergency services (critical in Cordova’s service territory) while passing through Cordova’s vast rural service territory, would clearly be contrary to the public interest. Grant of the requested waiver is consistent with the underlying purpose of Section

²⁸ *Id.*

²⁹ *Id.* at par. 12.

³⁰ *Id.*

54.307 and Section 254 of the Act, and Cordova has no reasonable alternative but to seek the requested waiver.

For the foregoing reasons, Cordova respectfully requests that the Commission waive Section 54.307(e)(3)(iv) of its Rules and allow Cordova to receive at least [REDACTED] of its baseline level of high cost support past July 1, 2015.

Respectfully requested,

CORDOVA WIRELESS COMMUNICATIONS, INC.

By:  _____

Michael R. Bennet
Kenneth C. Johnson
Bennet & Bennet, PLLC
6124 MacArthur Boulevard
Bethesda, MD 20816
(202) 371-1500

Its Attorneys

Date: October 1, 2012

cc (via email): Julie Veach
Carol Matthey

REDACTED – FOR PUBLIC INSPECTION

EXHIBIT A

Maps of Cordova Wireless Communications, Inc. Service Area and Cellular Coverage

EXHIBIT B

Cordova Tower Sites





Heney Tower





EXHIBIT C

Additional Information on Cordova, Alaska and Yakutat, Alaska



Community Database Online

State of Alaska > Commerce > DCRA > Community Database Online > Community Info > Details



Cordova

For Photos of Cordova [click here](#).

General Overview

Current Population:	2,289 (2011 DCCED Commissioner Certified Estimate, June 15, 2012)
Pronunciation/Other Names:	(core-DOH-vuh); includes Eyak
Incorporation Type:	Home Rule City
Located In:	Valdez-Cordova Census Area
School District:	Cordova City School District
Regional Native Corporation:	Chugach Alaska Corporation

Location:

Cordova is located at the southeastern end of Prince William Sound in the Gulf of Alaska. The community was built on Orca Inlet at the base of Eyak Mountain. It lies 52 air miles southeast of Valdez and 150 miles southeast of Anchorage. It lies at approximately 60.542780 North Latitude and -145.757500 West Longitude. (Sec. 28, T015S, R003W, Copper River Meridian.) Cordova is located in the Cordova Recording District. The area encompasses 61.4 sq. miles of land and 14.3 sq. miles of water.

History:

The area has historically been home to the Alutiiq and migrating Athabascan and Tlingit Natives who called themselves Eyaks. Alaskan Natives of other descents also settled in Cordova. Orca Inlet was originally named "Puerto Cordova" by Don Salvador Fidalgo in 1790. One of the first producing oilfields in Alaska was discovered at Katalla, 47 miles southeast of Cordova, in 1902. The town of Cordova was named in 1906 by Michael Heney, builder of the Copper River and Northwestern Railroad, and the city was formed in 1909. Cordova became the railroad terminus and ocean shipping port for copper ore from the Kennecott Mine up the Copper River. The first trainload of ore was loaded onto the steamship "Northwestern," bound for a smelter in Tacoma, Washington, in April 1911. The Bonanza-Kennecott Mines operated until 1938 and yielded over \$200 million in copper, silver, and gold. The Katalla oil field produced until 1933, when it was destroyed by fire. Fishing became the economic base in the early 1940s.

Culture:

Cordova has a significant Eyak Athabascan population with an active village council. Commercial fishing and subsistence are central to the community's culture.

Economy:

Cordova supports a large fishing fleet for Prince William Sound and several fish processing plants. In 2010, 337 residents held commercial fishing permits, and nearly half of all households have someone working in commercial harvesting or processing. Copper River red salmon, pink salmon, herring, halibut, bottom fish, and other types of fish are harvested. Reduced salmon prices have affected the economy. The largest employers are Trident Seafoods, Inc., Cordova School

District, Cordova Hospital, the city, and the Department of Transportation. The U.S. Forest Service and the U.S. Coast Guard maintain personnel in Cordova.

The 2006-2010 American Community Survey (ACS) estimated 1,159¹ residents as employed. The public sector employed 21.4%¹ of all workers. The local unemployment rate was 14.5%¹. The percentage of workers not in labor force was 32.1%¹. The ACS surveys established that average median household income (in 2010 inflation-adjusted dollars) was \$72,125 (MOE +/- \$16,194)¹. The per capita income (in 2010 inflation-adjusted dollars) was \$30,630 (MOE +/- \$3,064)¹. About 1.8%¹ of all residents had incomes below the poverty level.

¹ All ACS statistics are published with their respective margin of error (MOE). Some of the statistics here are calculated from the original ACS data. The MOE was unable to be carried through the calculations.

For additional ACS information please click [here](#).

For current Local Labor Market Information please click [here](#)

Facilities:

Cordova utilizes water from Murcheson Falls, Heney Creek dam, Meals Reservoir, Orca Reservoir, and Eyak Lake. The water is treated, but only the Eyak water is filtered. Water storage capacity is 2.1 million gallons. The city operates a piped water and sewer system. Sewage is treated before discharge. Over 90% of homes are fully plumbed. Some homes use individual wells and septic systems. A class 2 landfill and sludge disposal is available at mile 17. The community participates in recycling and a household hazardous waste program. Cordova Electric Cooperative operates the Humpback Creek Hydro Facility and two diesel-powered plants at Eyak and Orca.

Transportation:

Cordova is accessed by plane or boat. It is linked directly to the North Pacific Ocean shipping lanes through the Gulf of Alaska. It receives year-round barge services and state ferry service. The Merle K. "Mudhole" Smith Airport at mile 13 is state-owned and -operated, with a 7,500' long by 150' wide asphalt runway and 1,899' long by 30' wide gravel crosswind runway. The state-owned and city-operated Cordova Municipal Airport has a 1,800' long by 60' wide gravel runway. Daily scheduled jet flights and air taxis are available. Float planes land at the Lake Eyak seaplane base or the boat harbor. Harbor facilities include a breakwater, dock, small boat harbor with 850 berths, boat launch, boat haul-out, ferry terminal, and marine repair services. A 48-mile gravel road provides access to the Copper River Delta to the east.

Climate:

Winter temperatures average from 17 to 28 °F. Summer temperatures average from 49 to 63 °F. Average annual precipitation is 167 inches, and average annual snowfall is 80 inches.

Webmaster



Community Database Online

State of Alaska > Commerce > DCRA > Community Database Online > Community Info > Details



Yakutat

For Photos of Yakutat [click here](#).

For Maps of Yakutat [click here](#)

General Overview

Current Population:	656 (2011 DCCED Commissioner Certified Estimate, June 15, 2012)
Pronunciation/Other Names:	(YACK-uh-tat)
Incorporation Type:	Home Rule Borough
Located In:	City and Borough of Yakutat
School District:	Yakutat School District
Regional Native Corporation:	Sealaska Corporation

Location:

Yakutat is isolated among the lowlands along the Gulf of Alaska, 225 miles northwest of Juneau and 220 miles southeast of Cordova. It is at the mouth of Yakutat Bay, one of the few refuges for vessels along this stretch of coast. The Hubbard and Malaspina Glaciers are nearby. Its boundaries are the Canadian border to the north, Cape Suckling to the west, and Cape Fairweather to the east. Yakutat Borough is within and surrounded by the Tongass National Forests, Wrangell St-Elias National Park and Preserve, and Glacier Bay National Park and Preserve. It lies at approximately 59.546940 North Latitude and -139.727220 West Longitude. (Sec. 30, T027S, R034E, Copper River Meridian.) Yakutat is located in the Juneau Recording District. The area encompasses 7,650.5 sq. miles of land and 1,808.8 sq. miles of water.

History:

Yakutat has a diverse cultural history. The original settlers are believed to have been Eyak-speaking people from the Copper River area who were conquered by the Tlingits. Yakutat means "the place where the canoes rest." In the 18th and 19th centuries, English, French, Spanish, and Russian explorers came to the region. Fur traders were attracted to the region's sea otters. The Russian-American Company built a fort in Yakutat in 1805 to harvest sea otter pelts. Because the Russians would not allow local Tlingits access to their traditional fisheries, a Tlingit war party attacked and destroyed the post. In 1884 the Alaska Commercial Company opened a store in Yakutat. By 1886, the black sand beaches in the area were being mined for gold. In 1889 the Swedish Free Mission Church had opened a school and sawmill in the area. A cannery, sawmill, store, and railroad were constructed beginning in 1903 by the Stimson Lumber Company. Most residents moved to the current site of Yakutat to be closer to the cannery, which operated through 1970. During World War II, a large aviation garrison and paved runway were constructed. Troops were withdrawn after the war, but the runway is still in use. The City of Yakutat was formed in 1948, but in 1992 the city was dissolved and a borough was organized for the region.

Culture:

The area maintains a traditional Tlingit culture with influences from the original Eyak Athabascans, as well as Russian, English, and American traders and miners. Fishing and subsistence activities are prevalent.

Economy:

Yakutat's economy is dependent on fishing, fish processing, and government. In 2010, 153 residents held commercial fishing permits. North Pacific Processors is the major private employer. Recreational fishing opportunities, both saltwater and freshwater, are world-class. Most residents depend on subsistence hunting and fishing. Salmon, trout, shellfish, deer, moose, bear, and goats are harvested.

The 2006-2010 American Community Survey (ACS) estimated 306¹ residents as employed. The public sector employed 33.0%¹ of all workers. The local unemployment rate was 3.8%¹. The percentage of workers not in labor force was 24.6%¹. The ACS surveys established that average median household income (in 2010 inflation-adjusted dollars) was \$72,813 (MOE +/- \$20,062)¹. The per capita income (in 2010 inflation-adjusted dollars) was \$28,782 (MOE +/- \$5,688)¹. About 4.3%¹ of all residents had incomes below the poverty level.

¹ All ACS statistics are published with their respective margin of error (MOE). Some of the statistics here are calculated from the original ACS data. The MOE was unable to be carried through the calculations.

For additional ACS information please click [here](#).

For current Local Labor Market Information please click [here](#)

Facilities:

Water is derived from four wells and is treated and piped to all homes and schools in the community. Several wooden storage tanks provide pressure to the water system. Piped sewage receives primary treatment; a secondary treatment facility is nearing completion. A private firm collects refuse, and the borough operates the unpermitted landfill. Electricity is provided by Yakutat Power, Inc., using four diesel-fueled generators.

Transportation:

Yakutat has no road access. The airport has daily commercial jet service. There are also air taxis and float plane services to Yakutat. The state owns two jet-certified runways; one is concrete and 6,475' long by 150' wide, and the other is asphalt and 7,745' long by 150' wide. The airport is located three miles southeast of town, and a seaplane base is available one mile northwest. The U.S. Forest Service owns five airstrips in the vicinity, and the National Park Service operates one at East Alsek River. The borough operates the state-owned boat harbor and the Ocean Cape Dock. The state ferry provides service to Yakutat. Monti Bay is the only sheltered deep water port in the Gulf of Alaska. Barges deliver goods monthly during the winter and more frequently in summer.

Climate:

Yakutat has a maritime climate characterized by relatively mild, often rainy weather. Summer temperatures range from 42 to 60 °F and winter temperatures from 17 to 39 °F. Yakutat receives some of the heaviest precipitation in the state, averaging 132 inches of precipitation and 219 inches of snowfall each year.

Webmaster

EXHIBIT D

Rate Plans

Prepaid Cellular Service

No Contract

No Deposit

No Credit Check

*\$10.00, \$20.00, \$50.00,
\$100.00*

*You decide how much you
want to spend!!*

Visa & MasterCard Accepted



**P.O. Box 438
Cordova, AK 99574**



Voice & Data Plans

Tel: (907) 424-2300

Toll Free: (888) 240-7860

*621 Second Street
P.O. Box 438
Cordova, Alaska 99574*

www.cwcak.net

Cordova Wireless Communications, Inc.

Voice Plans Price List

STATEWIDE Monthly

G2 - Airtime 450 \$29.99

Includes Alaska long distance & Alaska roaming

NATIONWIDE Monthly

G3N - Airtime 600 \$35.99

Free Long Distance & Roaming

Free Nights & Weekends, Mobile to Mobile

G7 - Airtime 1000* \$49.99

Free Long Distance & Roaming

Free Nights & Weekends, Mobile to Mobile

ADD-ON Minutes to G7:

* 250 Airtime minutes \$12.50

* 500 Airtime minutes \$25.00

Add a user to plans G3N & G7 \$9.99

Nationwide Text Messaging, Call Waiting, Call Forwarding, and Caller I.D. included with all voice plans. **FREE**

NATIONWIDE UNLIMITED Monthly

G8 - Airtime Unlimited \$99.00

Unlimited Nationwide

Long Distance & Roaming

Add a user to plan G8 (5 max) \$35.00

Per minute charges & overages: Airtime G1-G6 \$0.20; Long Distance—\$0.15; Roaming—\$0.15; Airtime G3N & G-7 \$0.30

Nights & Weekends: 7:00 pm—6:59 am Alaska Time

Mobile to Mobile: to another CWC customer.

BUSINESS PLANS Monthly

G4 - Airtime 1500 \$59.99

500 minutes Long Distance,

100 minutes Roaming

G5 - Airtime 2500 \$79.99

700 minutes Long Distance,

200 minutes Roaming

G6 - Airtime Unlimited \$129.00

1000 minutes Long Distance, *\$35.00 add on*

300 minutes Roaming

Add a user to plans G4, G5 & G6 \$9.99

Other Voice Plans Monthly

Month-2-Month - Airtime 1500 \$59.99

500 minutes Long Distance, 100 minutes Roaming

No contract. \$25 activation fee & credit check req.

G1 Basic - Airtime 250 \$19.99

Long Distance \$0.15/min. & Roaming \$0.15/min.

Add a user to G1 (2 max) \$4.99

EMERGENCY - Airtime 60 \$9.99

Long Distance \$0.15/min. & Roaming \$0.20/min.

LIFELINE - Airtime 2500 \$1.00

Linkup— Receive up to \$22.50 off the service activation fee. Lifeline Linkup program is for local use and requires low-income eligibility. Call for more details.

ON ALL PLANS: Service agreement, credit approval and deposit may be required. Taxes, regulatory and surcharges not included. Early cancellation fee and other terms and conditions may apply.

Data Plans Price List

PHONE DATA Monthly

Standard Phone \$10.00

Unlimited Local, 40 MB Roaming

Requires Voice plan, overages \$1.00 / MB

Smartphone \$15.00

Unlimited Local, 50 MB Roaming

Requires Voice plan, overages \$1.00 / MB

TABLET DATA Monthly

Tablet & Air Card \$29.99

Unlimited Local, 50 MB Roaming

Requires 1 year agreement & device purchase

Overages \$1.00 / MB

Tablet & Air Card \$49.99

Unlimited Local Only Access

No contract required, min 1 full billing cycle

Roaming \$1.00 / MB

Family Data Plan \$39.99

Unlimited Local, 75 MB Roaming

Requires 1 year agreement & device purchase

Up to 5 devices on 1 plan, Overages \$1.00 / MB

Local MMS Picture Messaging

Now Available with all data Plans!

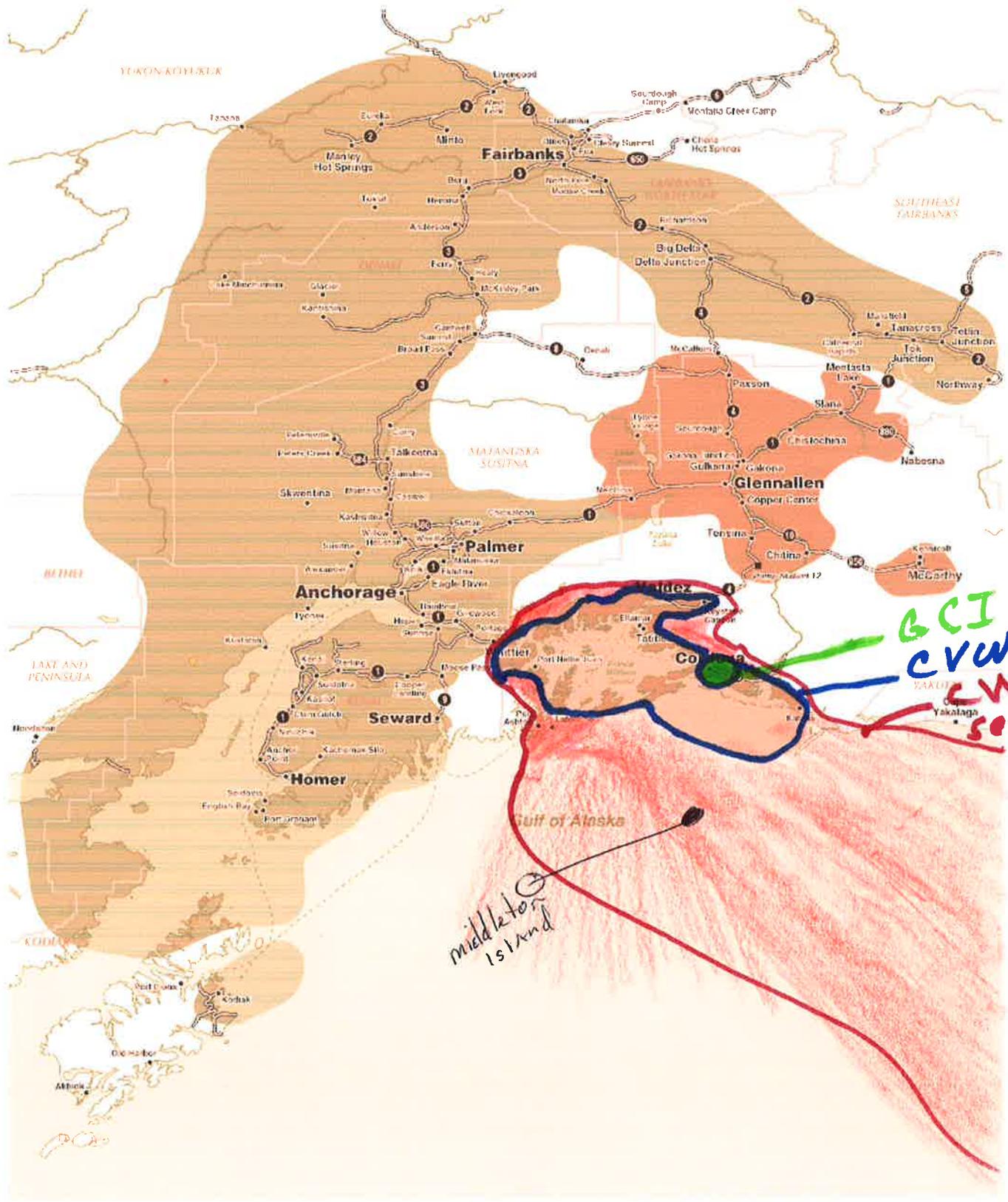
Cordova Wireless Communications, Inc. is a subsidiary of Cordova Telephone Cooperative. Customer Service (907) 424-2300

REDACTED – FOR PUBLIC INSPECTION

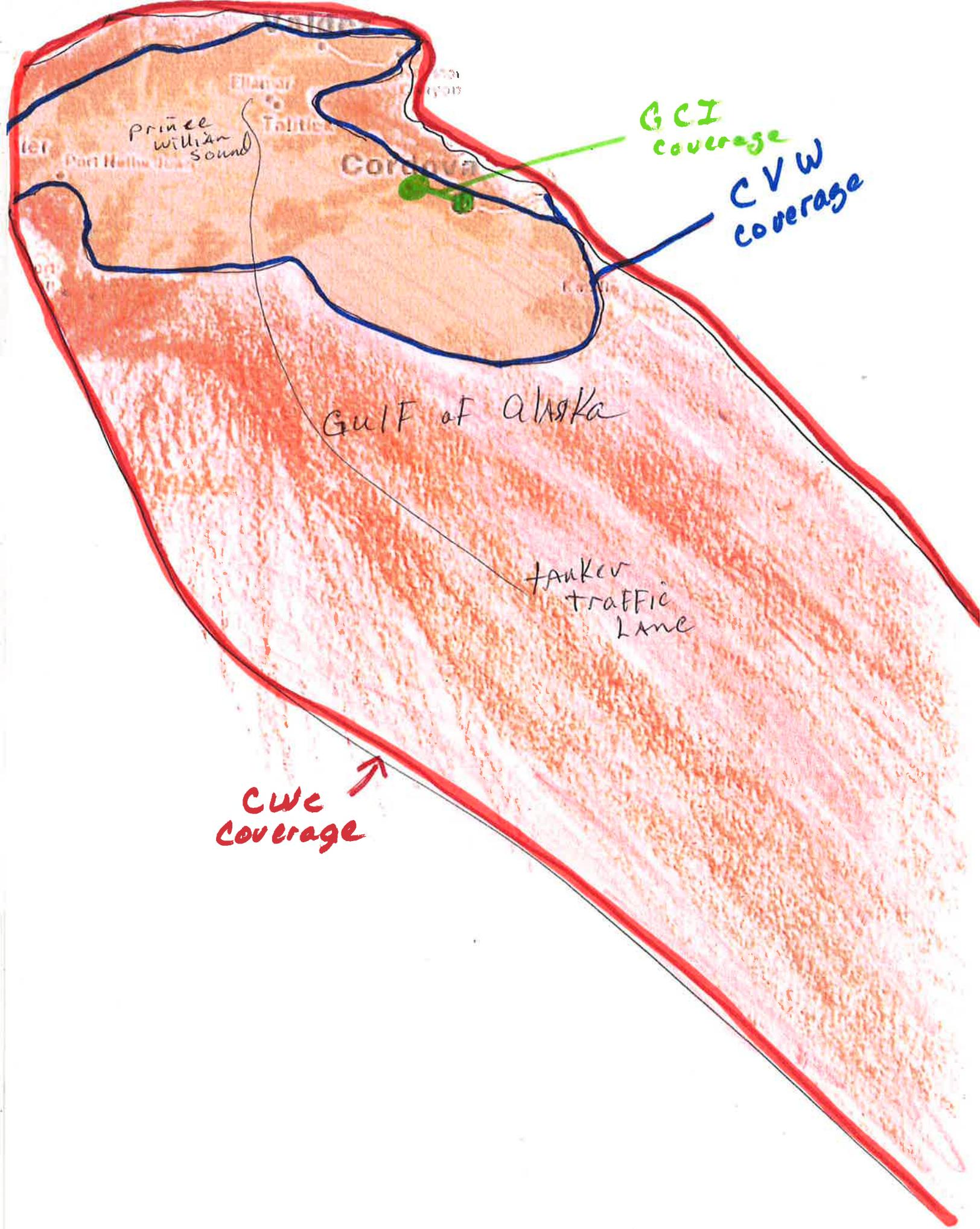
EXHIBIT E

Audited Financial Statements

EXHIBIT F
Drive Test Data



 CWC



Prince William Sound

Cordova

Gulf of Alaska

tanker traffic lane

GCI coverage

CVW coverage

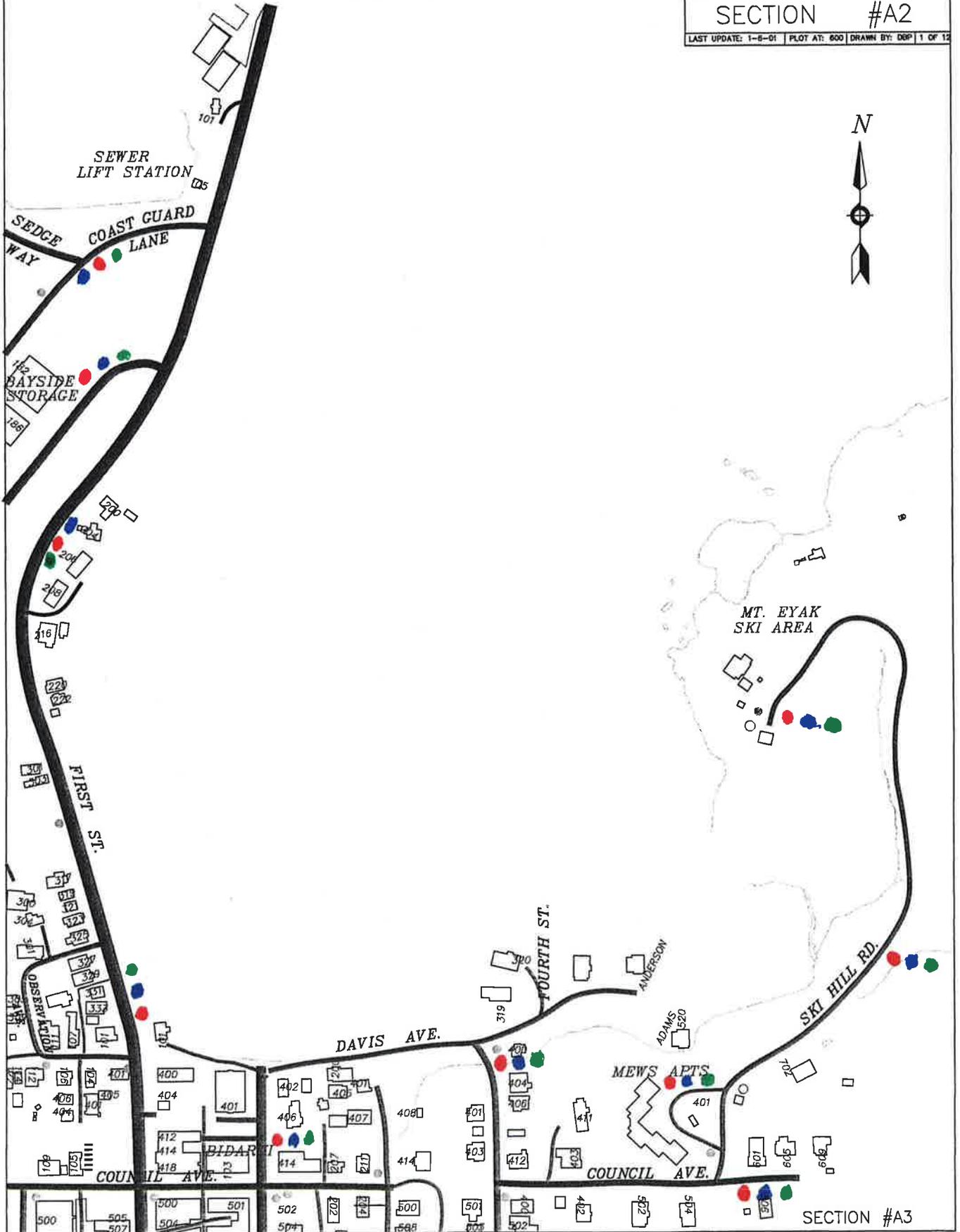
CWE coverage

SECTION #G2

PUBLIC SAFETY LOCATION MAP

SECTION #A2

LAST UPDATE: 1-8-01 | PLOT AT: 600 | DRAWN BY: DBP | 1 OF 12

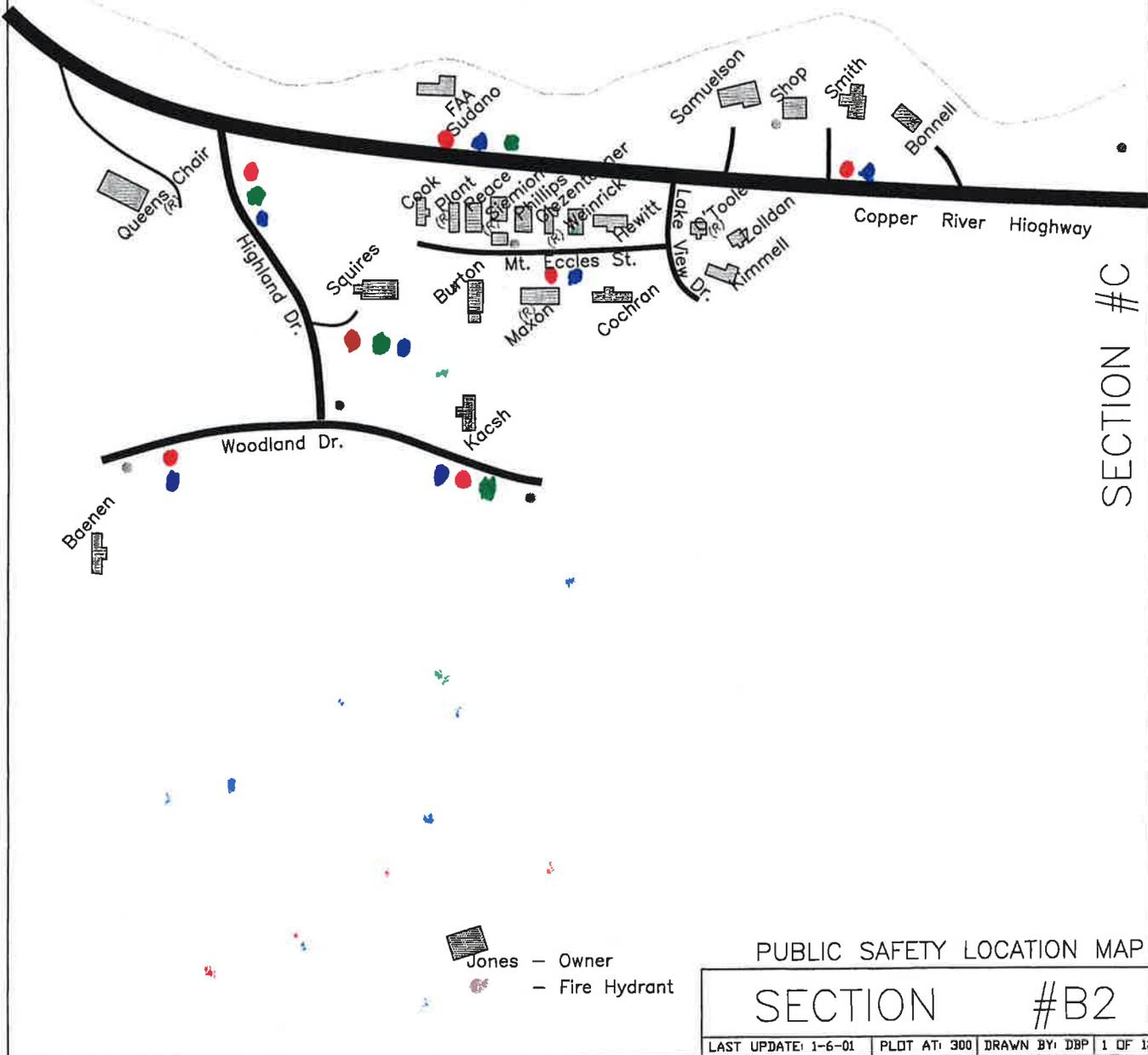


- CWC
- CVW
- GCS

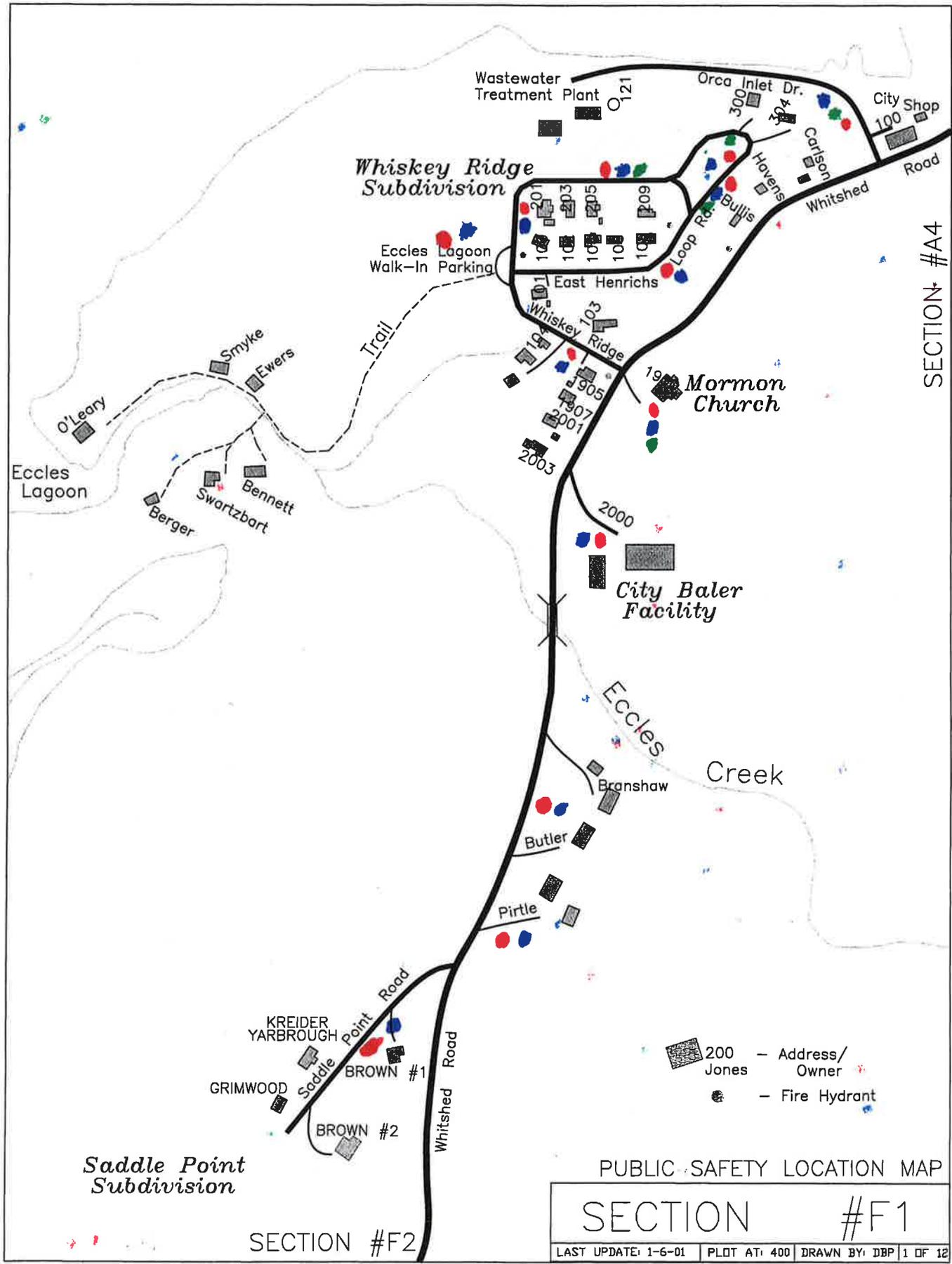
SECTION #B1

EYAK LAKE

SECTION #C

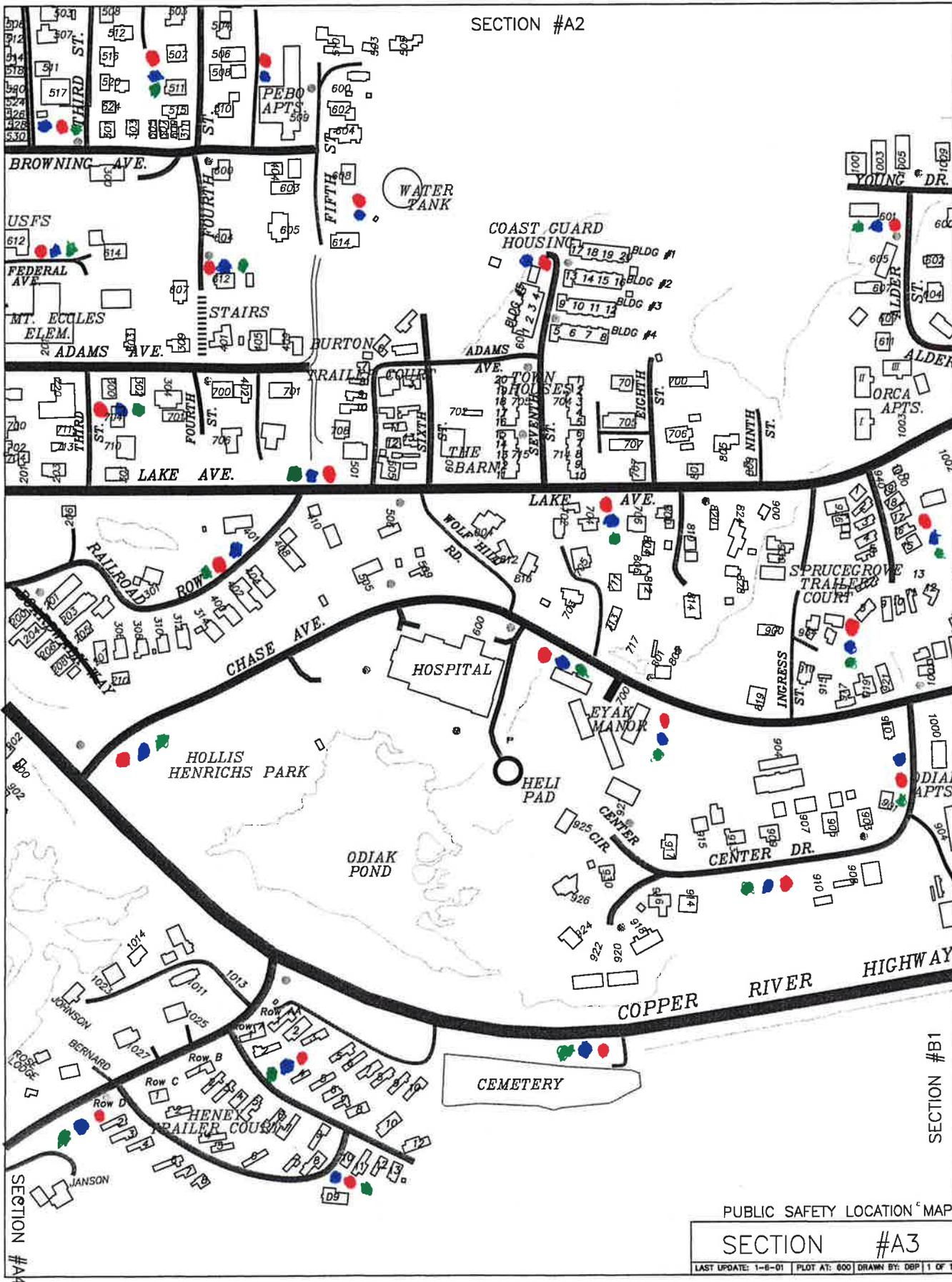


● CWC
 ● CVW
 ● GCI



● CVC
● CVW
● GCY

SECTION #A2



- CWC
- CVW
- GCT

PUBLIC SAFETY LOCATION MAP

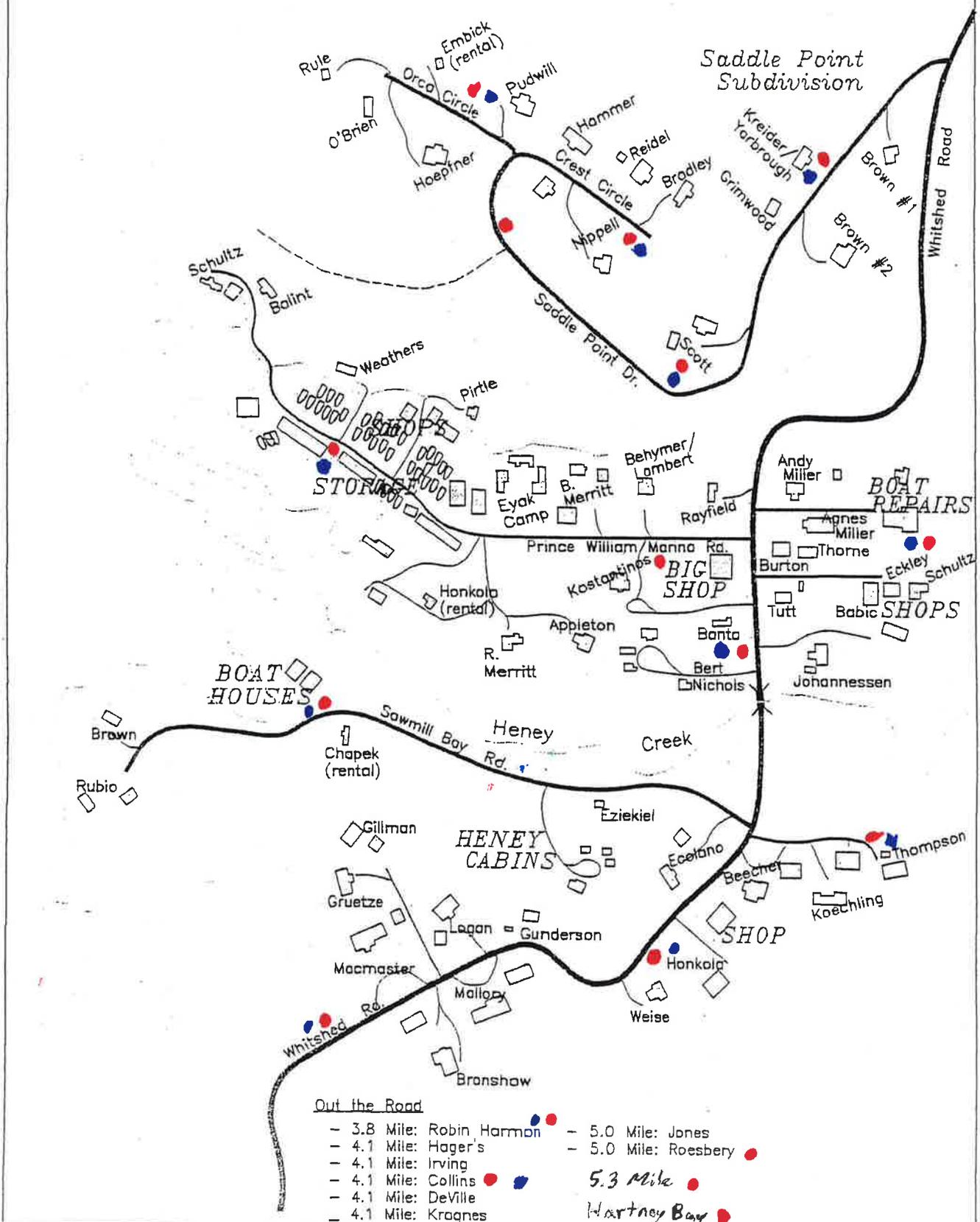
SECTION #A3

SECTION #F2

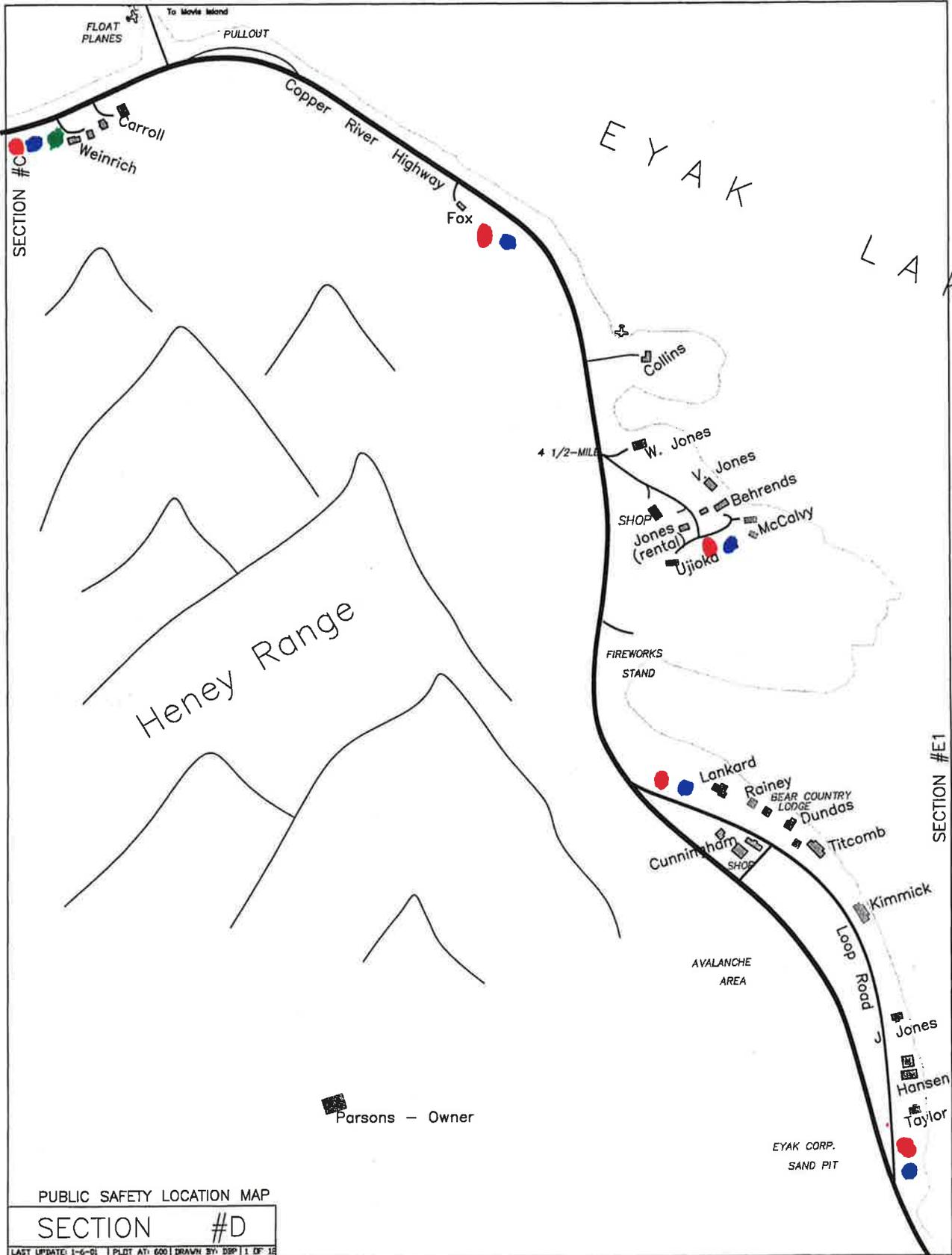
SECTION #F1

LAST UPDATE: 1-6-01 | PLOT AT: 400 | DRAWN BY: DBP | OF 12

□ Jones - Owner



● GWC
● CVW
● GCI



PUBLIC SAFETY LOCATION MAP

SECTION #D

LAST UPDATE: 1-6-01 | PLOT AT: 600 | DRAWN BY: DSP | 1 OF 14

- CWC
- CVW
- GCJ

FISH CLEANING STATION

OUT THE ROAD:

BLUE HERON INN: MIKE & VICKIE NOONAN ● ●

ORCA CANNERY COMPLEX: STEVE RAINEY

POINTS NORTH HELISKIING

ORCA ADVENTURE LODGE ● ●

CITY CHLORINATION BLDG.

WHEELCHAIR FISHING ACCESS

RESTROOMS

FLEMMING SPIT

440

430

420

HIPPY COVE SAUNA

410

SECTION #G2

NEW ENGLAND CANNERY RD.

PUBLIC SAFETY LOCATION MAP

SECTION #G1

LAST UPDATE: 10-6-99 | PLOT AT: 300 | DRAWN BY: DBP | 1 OF 5

● BWC
● CYW
● CCX

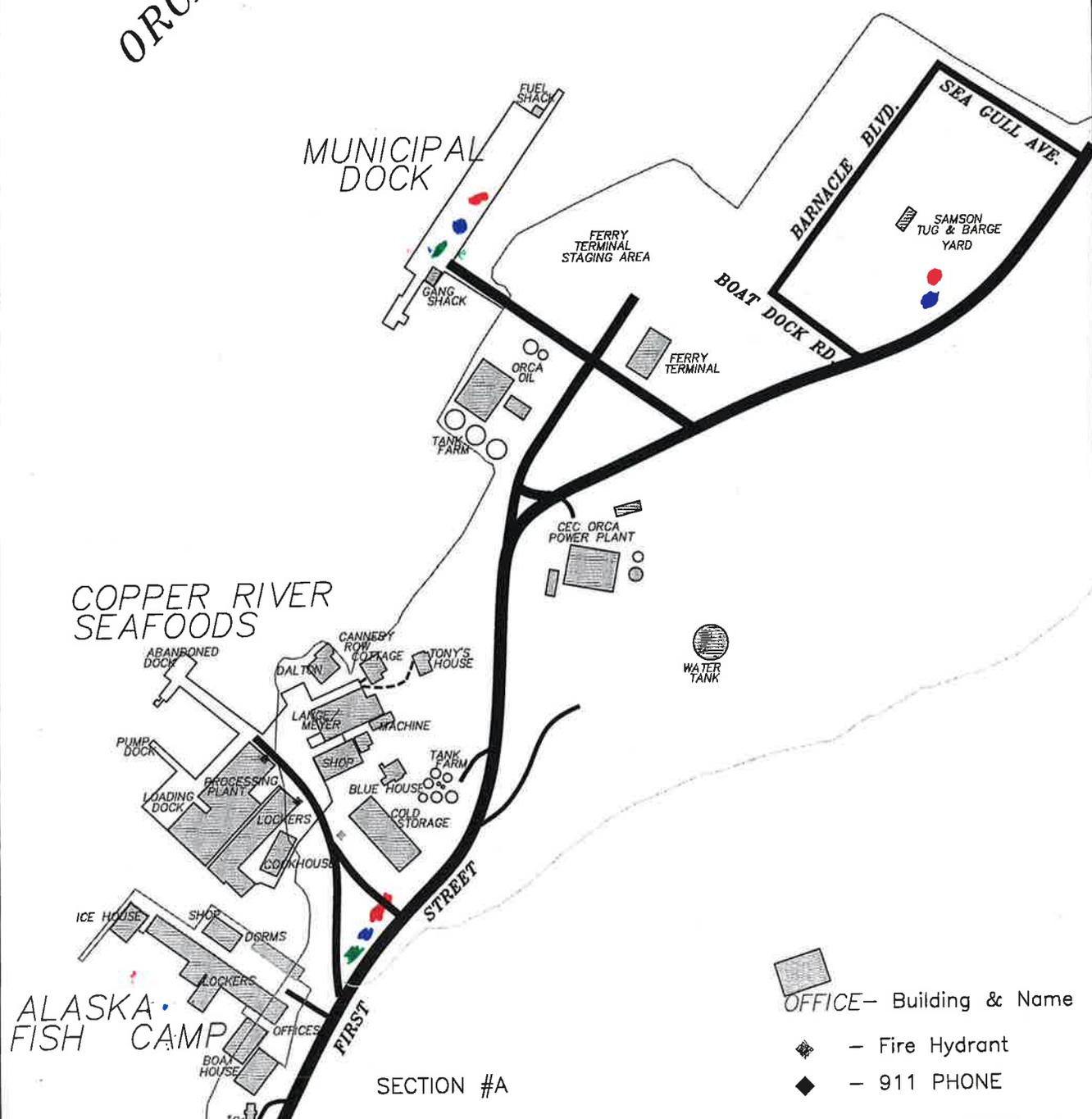
PUBLIC SAFETY LOCATION MAP

SECTION #G2

LAST UPDATE: 10-6-99 | PLOT AT: 300 | DRAWN BY: DBP | 1 OF 3

ORCA INLET

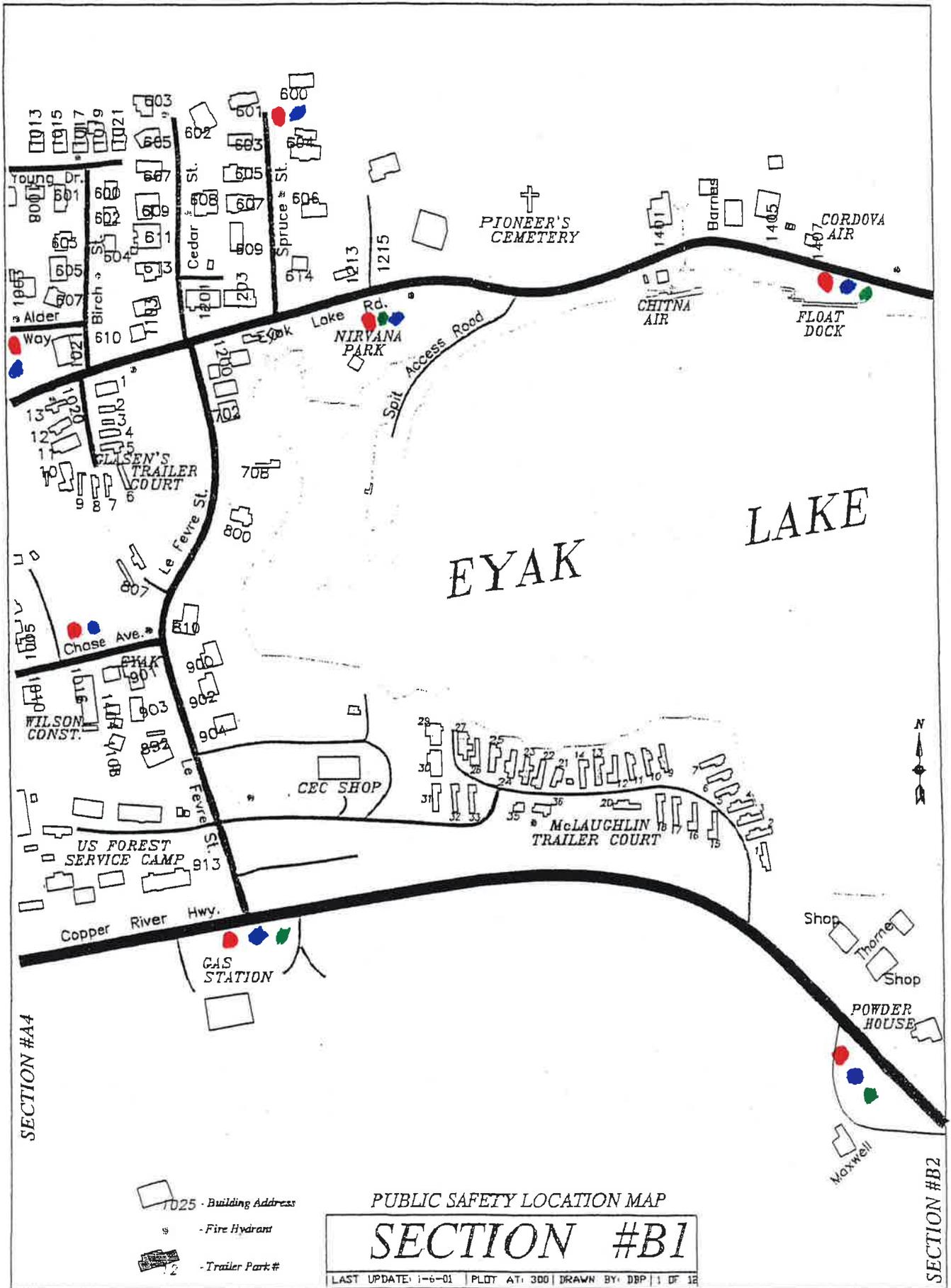
SECTION #G1



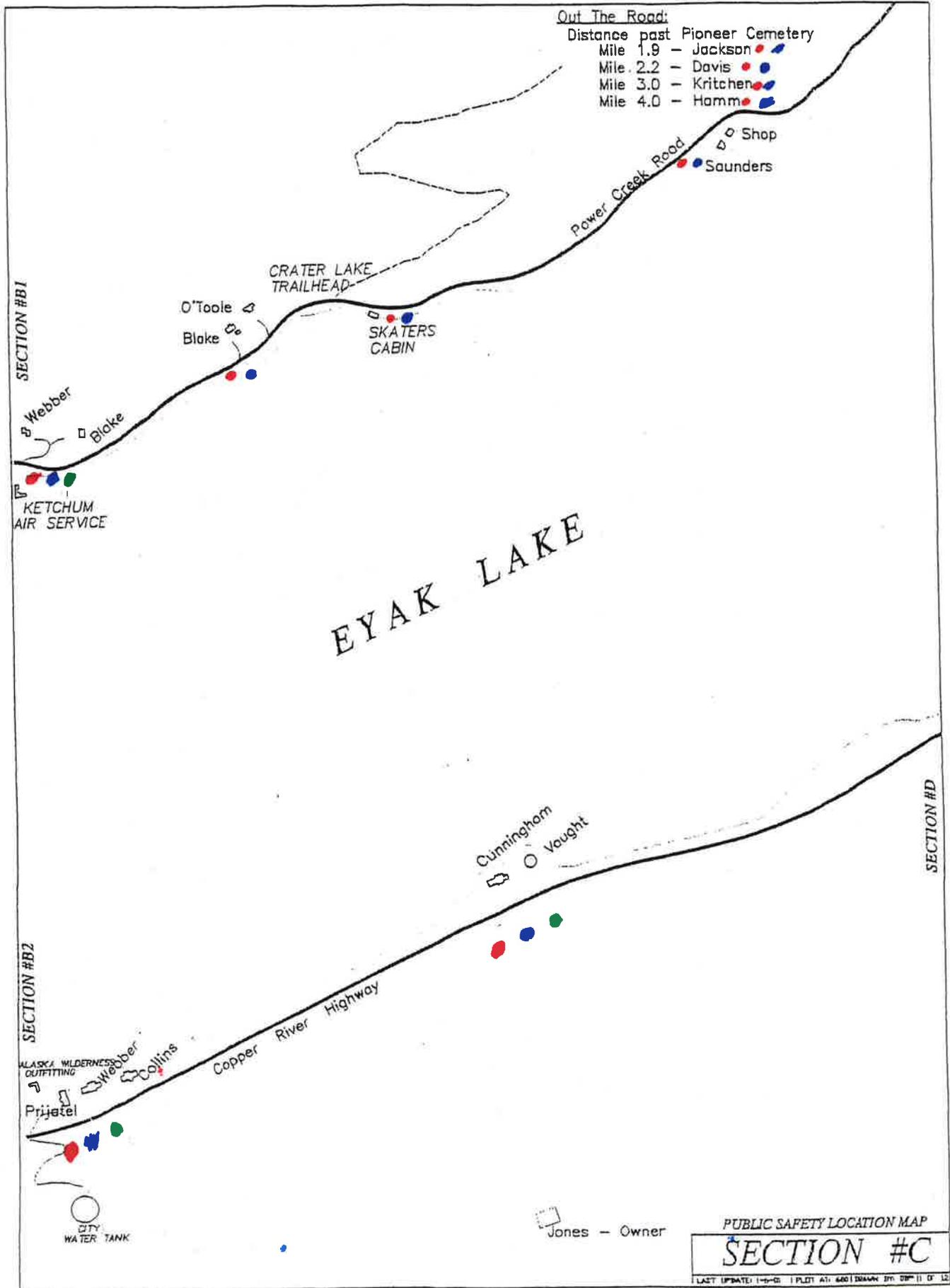
-  OFFICE— Building & Name
-  — Fire Hydrant
-  — 911 PHONE

● CWC
 ■ CFW
 ■ GCI

SECTION #A



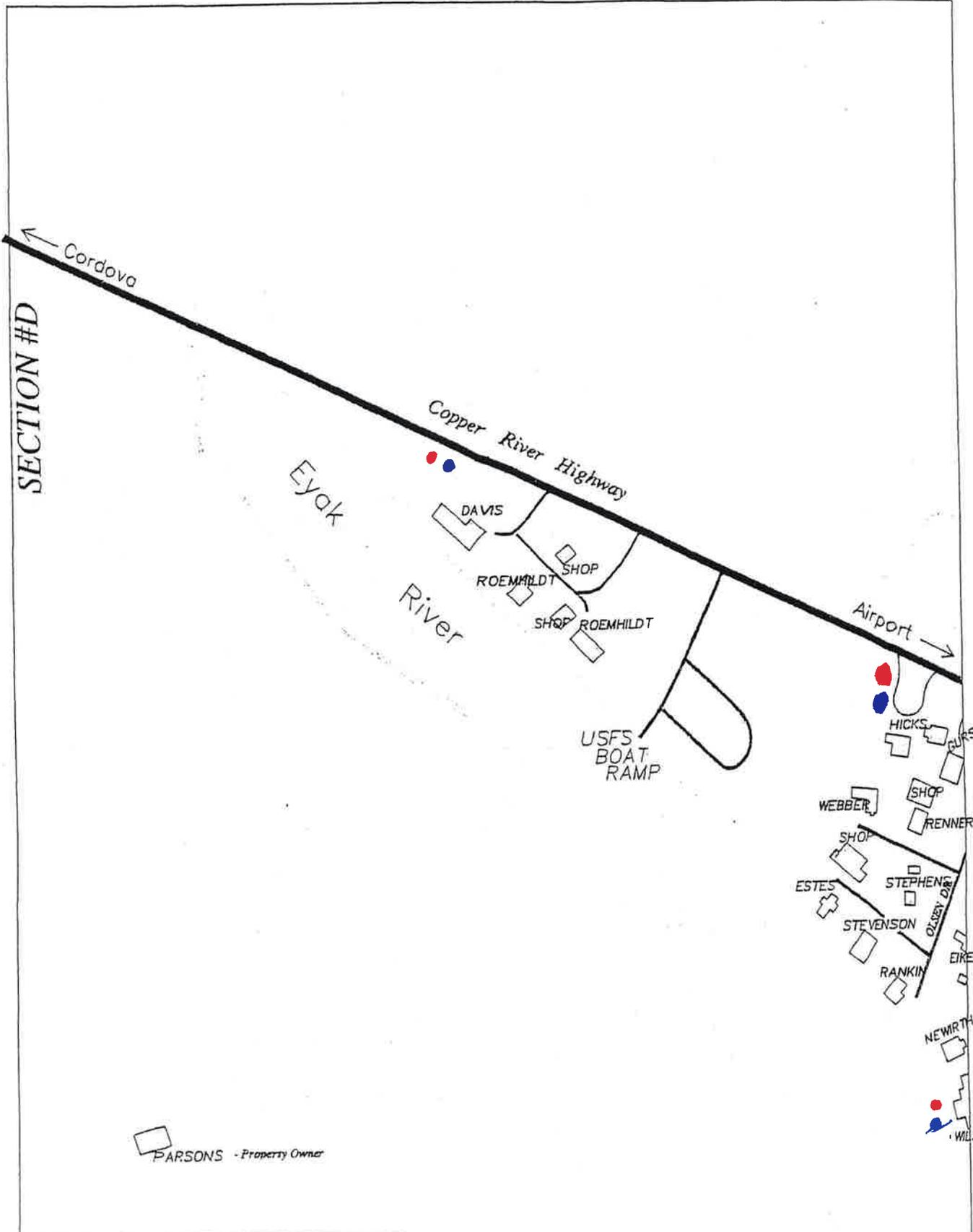
- - CWC
- - GVW
- - GER



Out The Road:
 Distance past Pioneer Cemetery
 Mile 1.9 - Jackson
 Mile 2.2 - Davis
 Mile 3.0 - Kritch
 Mile 4.0 - Hamm

PUBLIC SAFETY LOCATION MAP
SECTION #C

CWC
CVW
GCF

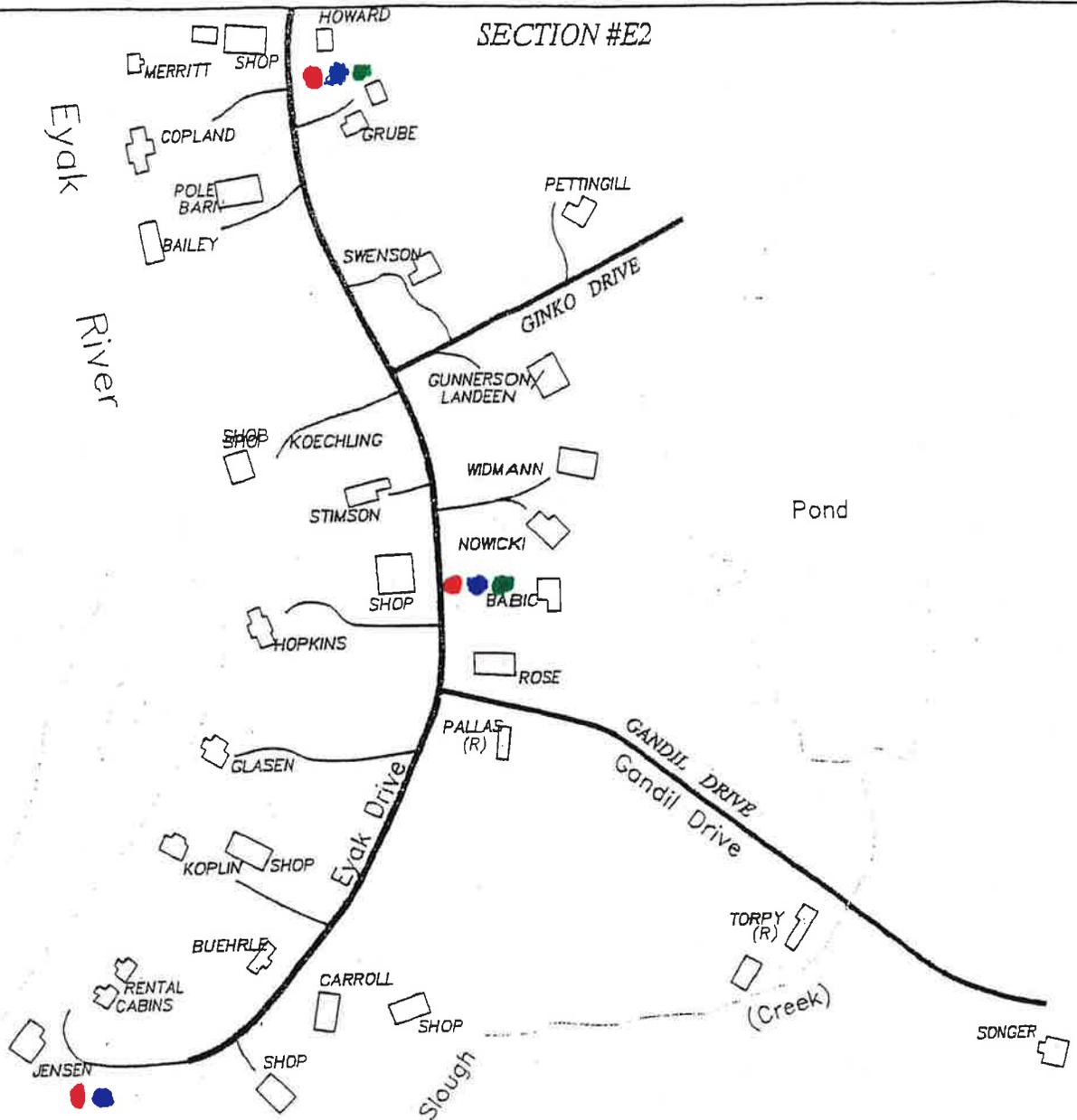


SECTION #E1
 LAST UPDATE: 1-6-01 | PLOT AT: 300 | DRAWN BY: DBP 1 OF 12

- BWC
- GW
- GCI

SECTION #E2

Eyak River



PARSONS - Property Owner

SECTION #E3

LAST UPDATE: 3-6-01 | PLOT AT: 300 | DRAWN BY: DBP || OF 12

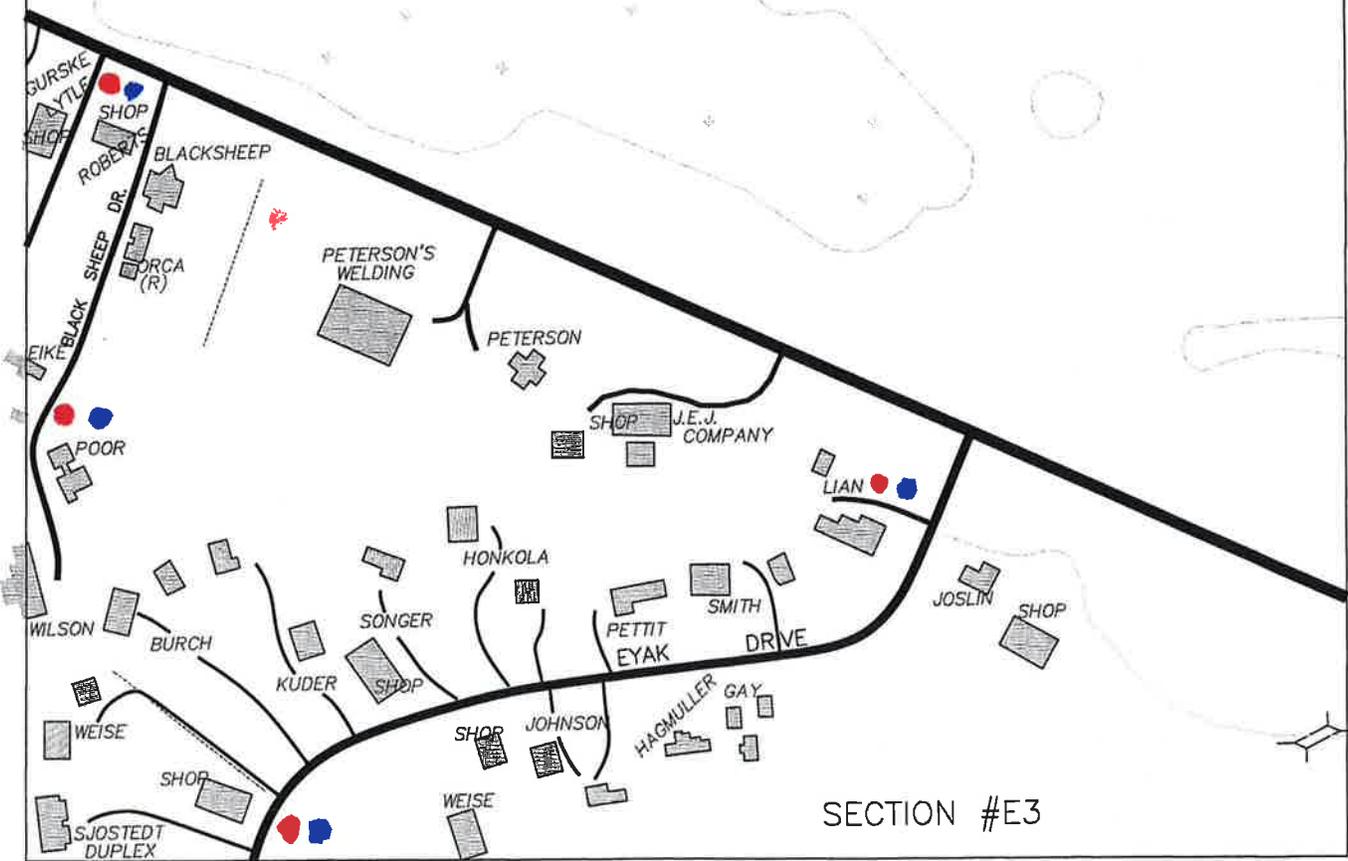
- CWC
- CVW
- GCY

SECTION #E2

LAST UPDATE: 1-6-01 | PLOT AT: 300 | DRAWN BY: DBP | OF 12



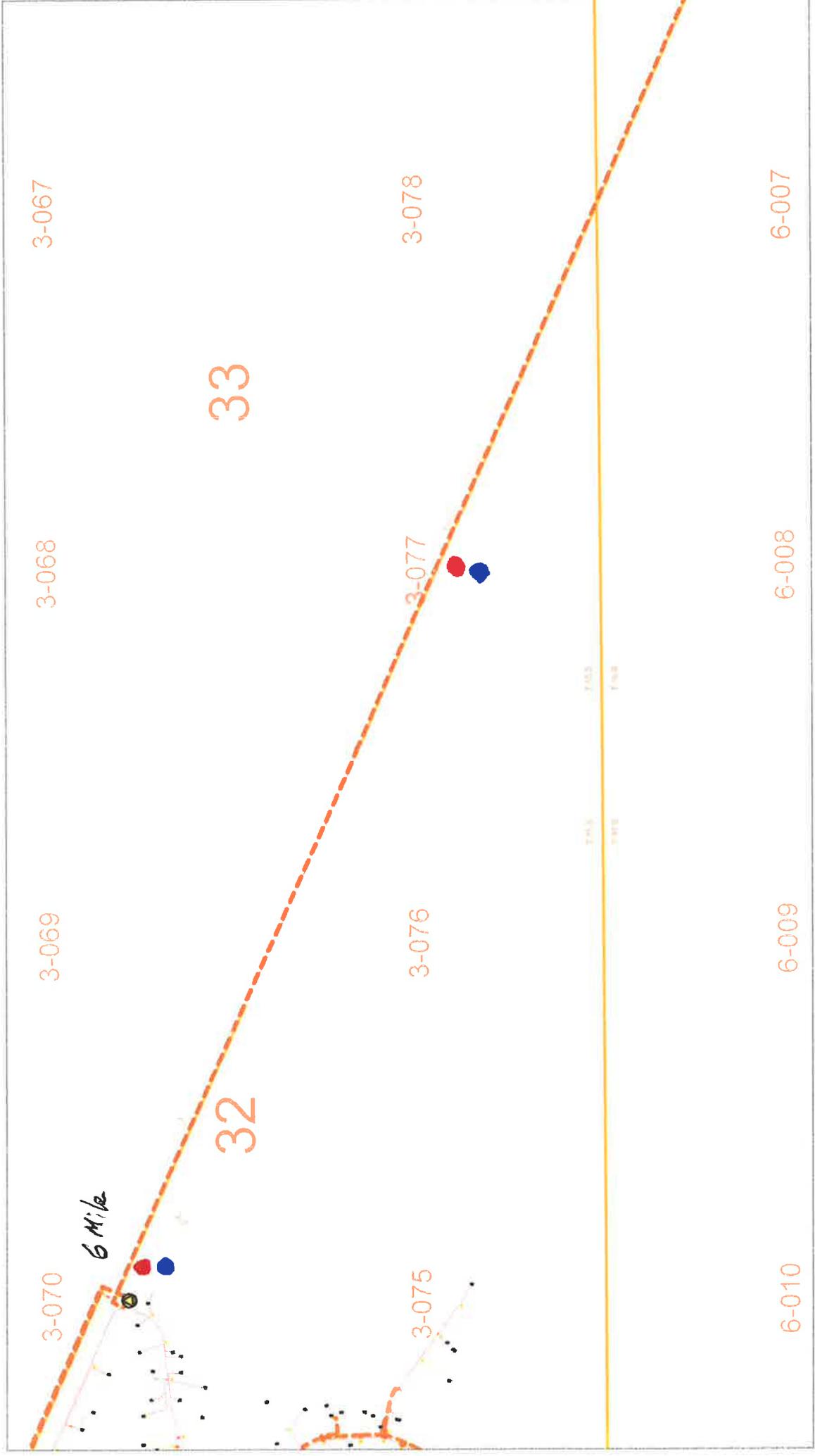
SECTION #E1



SECTION #E3

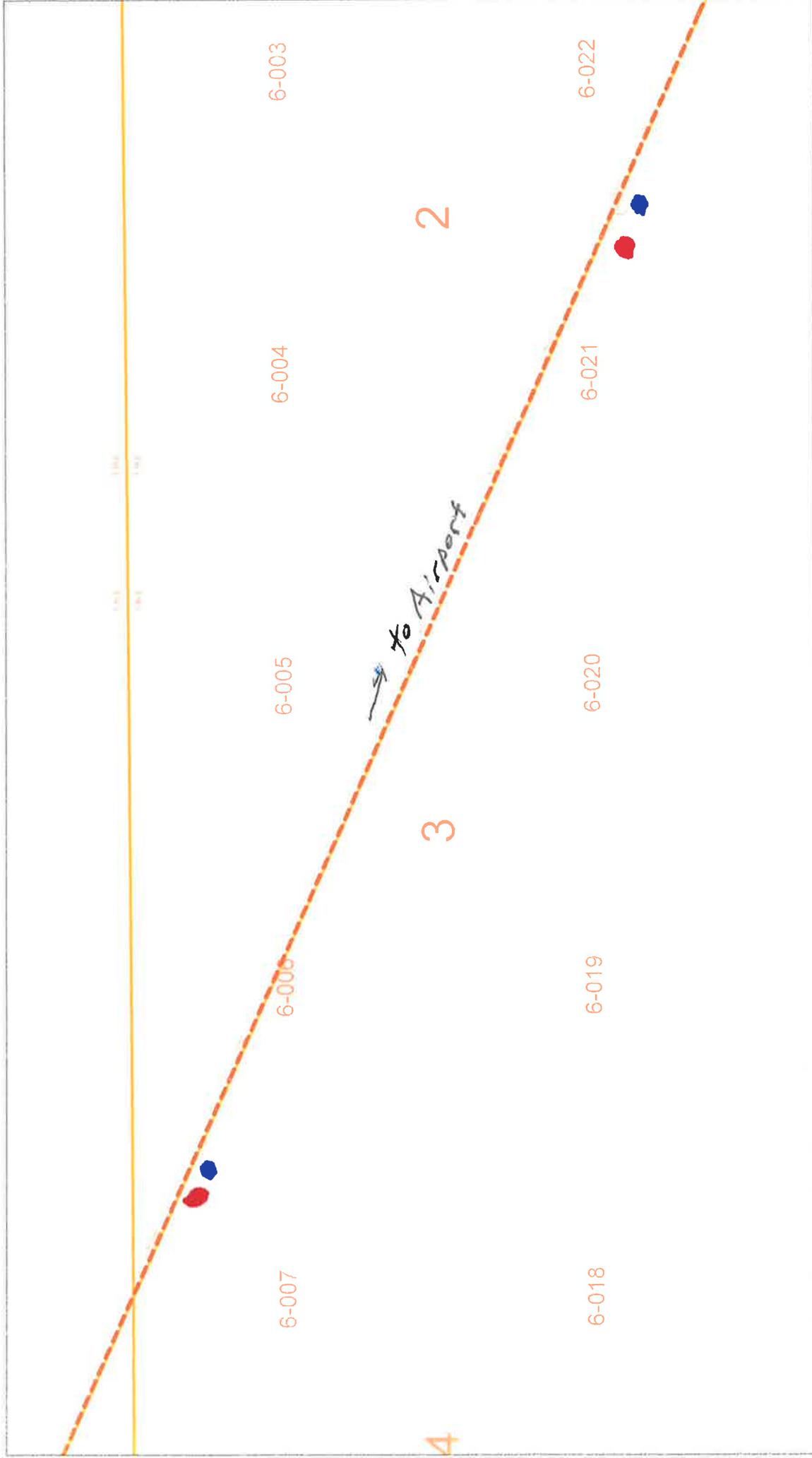
- CWC
- CYW
- GCX

Cordova Telephone Company

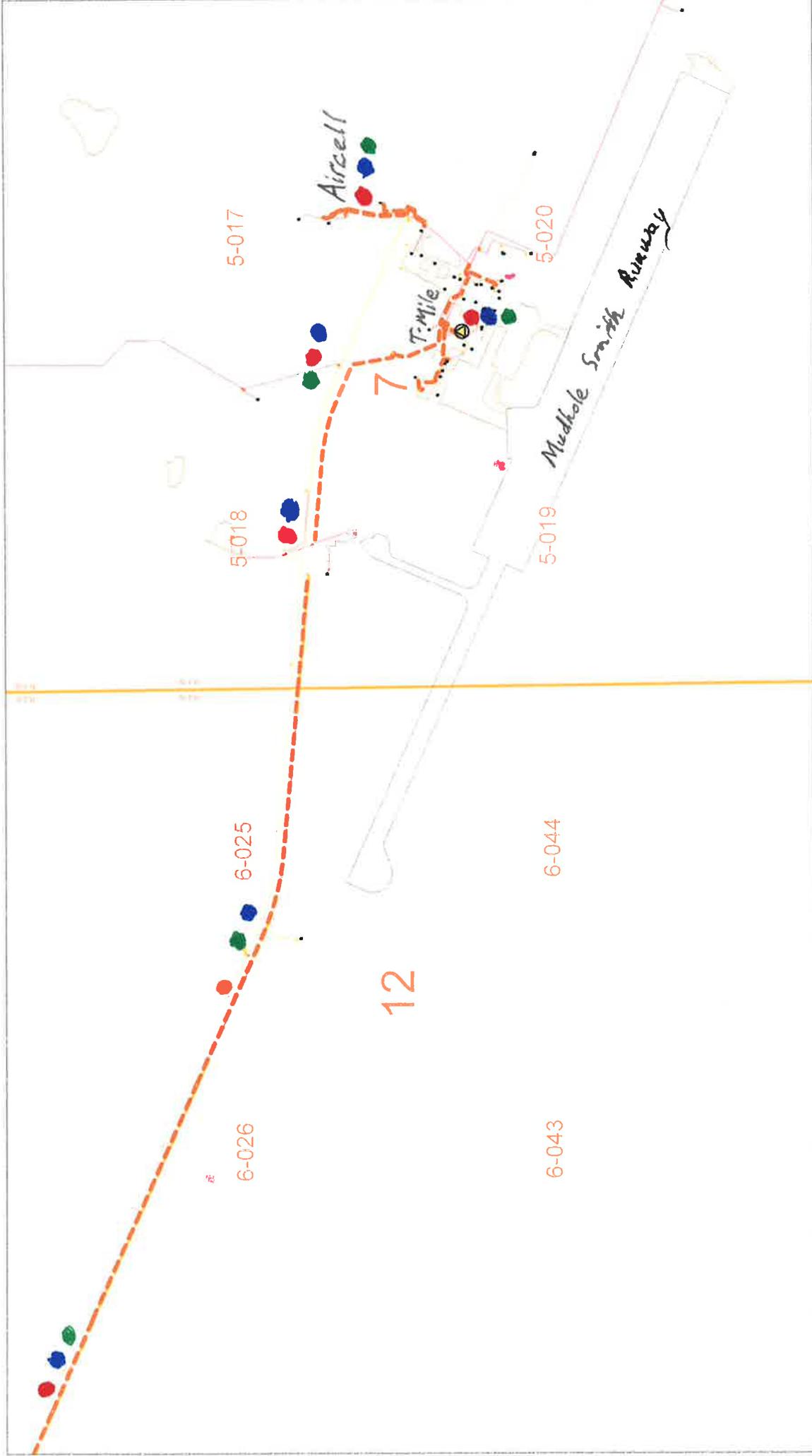


- CMC
- CYW
- GCI

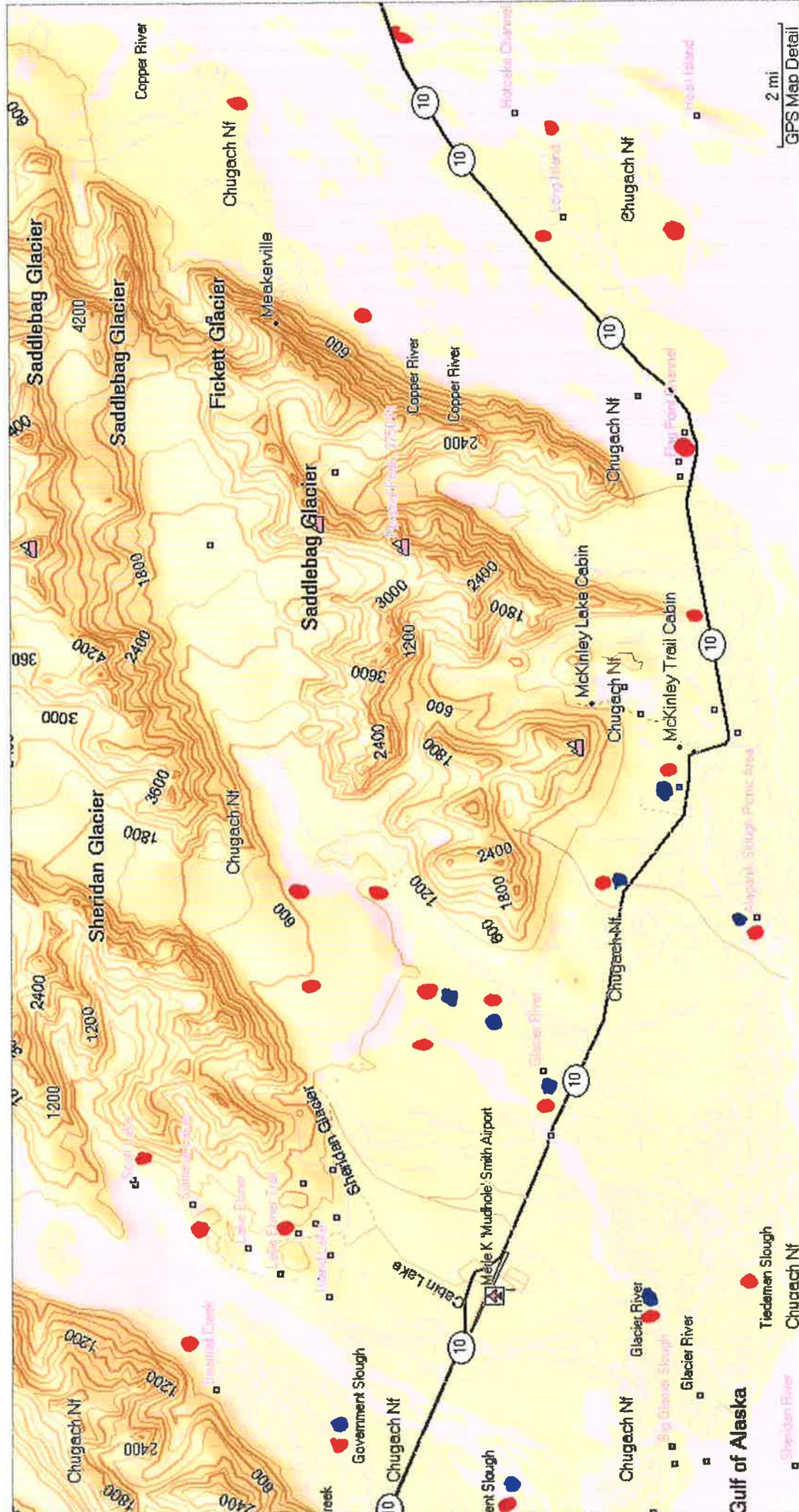
Cordova Telephone Company



Cordova Telephone Company



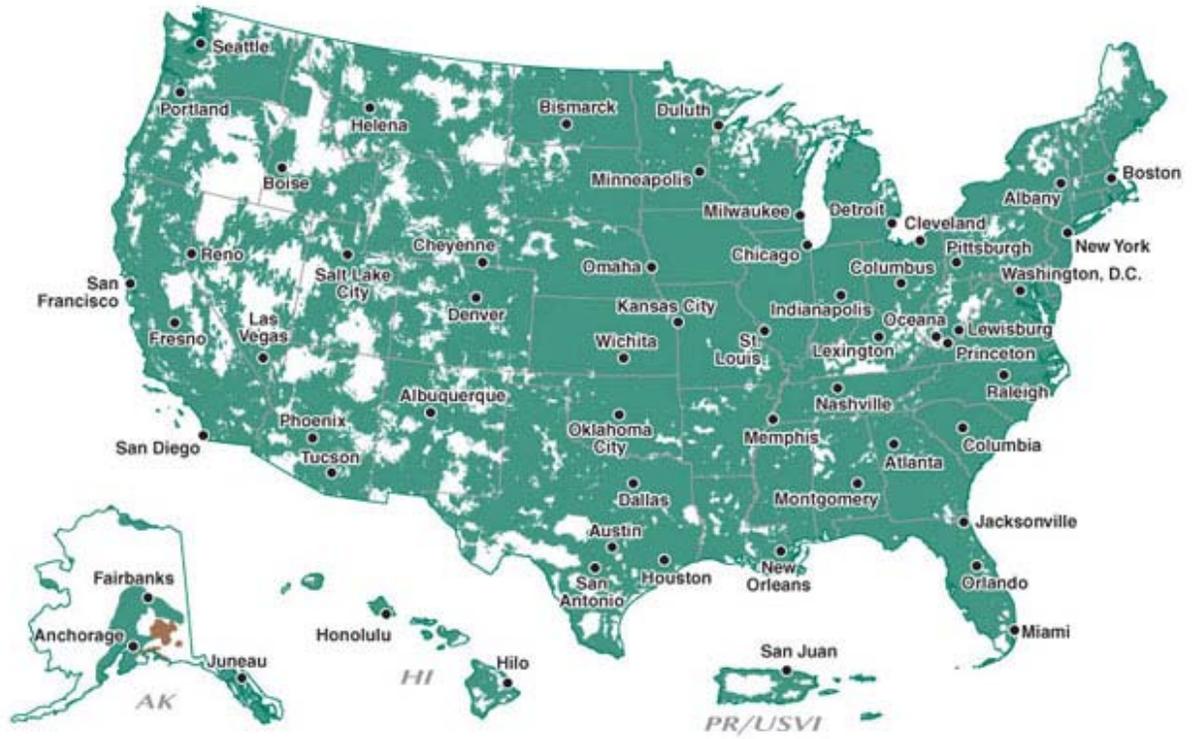
- CWC
- CFW
- GCF



- CWC
- CVW
- GCI

EXHIBIT G

Copper Valley Wireless and GCI Coverage Areas



- My Location: Choose Service Location
- MyGCI
- Find A Store
- Get Support
- Check My Email
- View My Usage
- Pay My Bill

Connecting Alaskans.

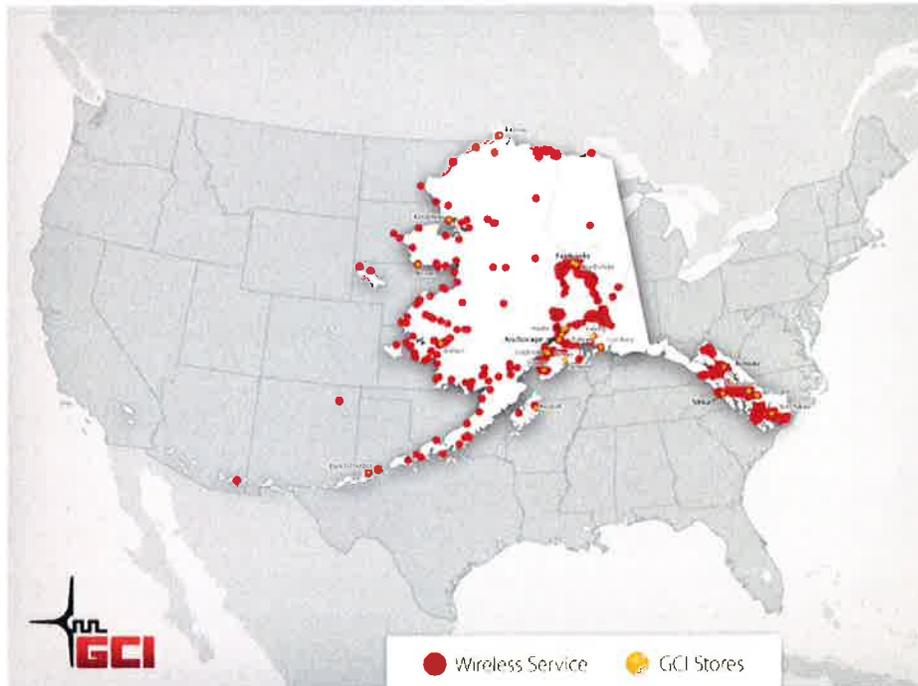
Search Our Site...

- Home
- Wireless
- Internet
- Phone
- Video
- Packages
- Business & Enterprise

- Wireless
- Phones & Devices
- Plans & Features
- Coverage
- Special Offers
- Packages
- Support

Coverage

GCI operates the largest wireless network in the state of Alaska. Click on the [map below](#) to use a detailed interactive coverage map. Prepaid coverage map available [here](#).



Ready?
There's a GCI store near you!

Visit any of GCI's stores to talk with a rep about your unique needs.

[Find a GCI Store](#)

or call us at 1.800.800.4800

Need Help?

- > Ask a Question
- > Get Online Support
- > Contact Us

Coverage
Get Alaska's largest statewide coverage! »

- Services**
- Packages
 - Wireless
 - Internet
 - Video
 - Phone

- Support**
- Latest Knowledge
 - Service Notifications
 - Virus Alerts
 - Jobs in Alaska

- Business**
- Voice
 - Internet & Data
 - Video
 - Wireless
 - Advertising

- Enterprise**
- Network Management
 - Industry Solutions
 - Industrial Telcom
 - Carrier Access

- Regulatory Info**
- Public Notices
 - Carrier Common Line Reports
 - Tariff Sheets
 - Sweepstakes

- About GCI**
- Contact Us
 - Executive Team
 - Careers at GCI
 - PSA Submissions
 - Investor Relations
 - News Releases



REDACTED – FOR PUBLIC INSPECTION

EXHIBIT H

Revenue and Expense Data

REDACTED – FOR PUBLIC INSPECTION

EXHIBIT I

Projected Revenues and Expenses