



October 25, 2012

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; *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 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

Dear Ms. Dortch:

On Tuesday, October 23, 2012, I, on behalf of General Communication, Inc. ("GCI"), spoke with Michael Steffen, legal advisor to Chairman Genachowski, and Carol Matthey, deputy bureau chief of the Wireline Competition Bureau. On Wednesday, October 24, 2012, I spoke with Nicholas Degani, of the Wireline Competition Bureau.

With respect to the Commission's upcoming NPRM on the disposition of unused CAF Phase I funds for 2012, I discussed GCI's comments in response to ACS' petition for waiver. In those comments, GCI described a reverse auction mechanism that could be used to distribute such support while ensuring that it achieved the maximum "bang for the buck" in each area. Those comments are incorporated here by reference.

Please contact me if you have any questions.

Sincerely,

John T. Nakahata
Counsel to General Communication Inc.

cc: Michael Steffen
Carol Matthey
Nicholas Degani