

**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, D.C. 20554**

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

**COMMENTS OF GENERAL COMMUNICATION, INC.**  
**ON MOBILITY FUND PHASE II**

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December 21, 2012

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**I. INTRODUCTION AND SUMMARY**

General Communication, Inc. (“GCI”) files these comments in response to the Commission’s Public Notice seeking further comment with respect to the implementation of Mobility Fund Phase II.<sup>1</sup> Although GCI was a successful bidder in Mobility Fund Phase I, GCI does not believe that Mobility Fund Phase I alters the concerns it raised in its January 18, 2012 Comments with respect to Mobility Fund Phase II.<sup>2</sup> In the absence of a significant set-aside, it is unlikely that Alaska’s rural communities will be able to retain current levels of support, let alone those that would be necessary to deliver basic mobile voice service to those communities that lack any such service and to upgrade all of Alaska to mobile broadband data speeds of 768 kilobits per second (kbps) downlink and 200 kbps uplink. The exercise of preparing for and participating in Mobility Fund Phase I proved what had been anticipated: coverage and compliance rules built for the Lower 48 did not translate well for Alaska’s unique service

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<sup>1</sup> See *Further Inquiry into Issues Related to Mobility Fund Phase II*, Public Notice, DA 12-1853, WC Docket No. 10-90 and WT Docket No. 10-208 (rel. Nov. 27, 2012) (“Public Notice”).

<sup>2</sup> See Comments of General Communication, Inc., WC Dockets Nos. 10-90, 07-135, 05-337, 03-109, GN Docket No. 09-51, CC Docket Nos. 01-92, 96-45, and WT Docket No. 10-208 (filed Jan. 18, 2012) (“GCI Comments”).

configuration, which imposed additional costs and resource demands on the project and affected the manner in which bids could be reasonably presented to achieve rational, cost effective proposals.

There can be no doubt that Alaska has a substantial need for universal service support in order to be able to have access to mobile voice and data services comparable to the rest of the United States. In its initial comments, GCI catalogued the factors, including distance, population density, extreme climate, and lack of supporting right-of-way and electric infrastructure, that make Alaska a uniquely high cost environment for telecommunications deployment.<sup>3</sup> GCI, with the assistance of the Brattle Group, has modeled the incremental costs of upgrading all of Alaska to 768/200 mobile voice and broadband service, and estimates that the five year net present value of the costs of doing so is approximately \$600 million.<sup>4</sup> Given the small population and limited economy in many of these areas, the model projects incremental service revenues from that upgrade (and in some cases, first time deployment of mobile wireless networks) of a five year net present value of approximately \$64 million. Accordingly, the model projects that external support of a five year net present value of approximately \$536 million will be needed to complete and operate the statewide deployment of 768/200 mobile voice and broadband service. Even if one were to consider the entire current CETC Remote Alaska annual high cost support as applied to support 768/200 service, that annual \$78 million in CETC high cost support only is a five year net present value of approximately \$316 million. And that does not address the existing costs of maintaining the existing wireless deployments. In all likelihood, Remote

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<sup>3</sup> See GCI Comments at 2-4, 14.

<sup>4</sup> GCI will file this model with the FCC in early 2013. The net present values are computed using a discount rate of 7.5%.

Alaska will need more, not less, CETC high cost support in order to meet the Commission's goal of ubiquitous 768/200 mobile voice and broadband service.

In this context, it simply makes no sense to further withdraw high cost universal service support from Alaska. But that is the most likely result if mobile broadband unserved areas in Remote Alaska must bid in competition with unserved mobile broadband areas in the rest of the country. The high costs of backhaul to areas that are not served by fiber networks, combined with low population and few roads, will likely make Remote Alaska uncompetitive, as the Mobility Fund Phase I auction results showed.

Instead, the Commission should actually or virtually establish a separate Remote Alaska Mobility Fund, with funding set aside from the rest of Mobility Fund Phase II. In determining the amount of that Remote Alaska Fund, the Commission should include not just the existing amount of Remote Alaska CETC support, but also should consider whether it should make additional funding available from, for example, wireline networks in Remote Alaska, particularly in areas in which the lack of terrestrial backhaul makes it unlikely that mass market wireline broadband speeds will be significantly greater than mass market mobile broadband speeds.

In addition, GCI offers several specific responses to the Commission's proposals raised in its Public Notice. *First*, when the largest community in a census block is not in the centroid, GCI recommends that the Commission use the largest community in a block to determine whether an area is served where the largest community. This would avoid some of the anomalous results that can be yielded by the centroid approach. *Second*, GCI recommends that the Commission prioritize awards to areas that lack access to the National Highway System. Many areas in Alaska are not on the road system, and those areas would be unlikely to gain the support needed to maintain or expand service without prioritization. *Third*, the Commission

should again adopt the broad definition of road miles that it employed in Phase I, which included not only primary, secondary, and local and rural roads and streets, but also four wheel drive vehicular trails, service drives, and private roads for service vehicles. If feasible, GCI would add navigable river miles to this list, to capture areas where rivers are used in lieu of roads. Further, though census *blocks* are individual bidding units in Alaska, for the purposes of determining whether the public interest buildout requirements are met, calculating road coverage based on all blocks awarded to a bidder within a census *tract* may simplify allocating miles of the shared roads bordering each block and also avoid anomalies created by hard-to-serve areas (such as gullies) in areas with only a very small amount of road mileage. *Fourth*, areas served only by satellite backhaul should have reduced broadband performance requirements for the first five years, because it will be extremely costly to obtain sufficient satellite backhaul to support higher speeds. *Fifth*, Tribal credits should focus on service to tribal areas rather than tribal ownership. Some of the Commission’s proposals would only add unnecessary complexity and uncertainty without providing positive results. However, if the Commission nonetheless implements “priority units” or similar bidding credit approaches, they should apply to all providers serving Tribal Lands.

**II. ALASKA’S ABILITY TO SECURE SOME SUPPORT THROUGH MOBILITY FUND PHASE I DOES NOT MEAN THAT ALASKA WILL SECURE SUPPORT NECESSARY TO DEPLOY REASONABLY COMPARABLE MOBILE BROADBAND SERVICES FOR REMOTE ALASKA THROUGH MOBILITY FUND PHASE II.**

Before turning to the specific questions in the Public Notice, it is important to recognize that Alaska’s success in obtaining some support in Mobility Fund Phase I does not mean that it would be appropriate to simply bid Mobility Fund Phase II through a nationwide reverse action if the goal is to ensure that all parts of the country, including Alaska, can have reasonably comparable mobile voice and broadband services. As GCI explained in its initial comments, it is

likely that a nationwide reverse auction will leave Alaska without sufficient support, because the combination of high costs and low population density—and few roads—means that under almost any formulation, the amount of support that Alaska will need will be extremely high in comparison to the rest of the United States.<sup>5</sup> This will be especially true after Mobility Fund Phase I because many of the areas served by GCI’s TERRA-SW terrestrial microwave backhaul network will receive upgraded mobile voice and broadband service under GCI’s Phase I award.<sup>6</sup>

In looking at the Phase I results for Alaska, although Alaska was the winning bidder for some areas, the support was extremely low as a percentage of the entire fund. Winning bids for Alaska totaled only \$3.2 million of the \$300 million being awarded. If Alaska can do even that well, it would receive only \$5-6 million per year of the \$500 million being bid in Phase II. That is a small fraction of Remote Alaska CETC support being paid today, and nowhere near the amount necessary to simply maintain mobile voice service, let alone reach areas with no mobile voice service or upgrade mobile broadband service in those areas where market forces alone will not do so.

Furthermore, it is important to recognize that the only areas in which an Alaska bidder won sufficient support to accept the Phase I award are areas in which GCI had access to the

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<sup>5</sup> See GCI Comments at 6-7.

<sup>6</sup> While these areas receiving Mobility Fund Phase I support would not be considered areas served by an “unsubsidized competitor”, see *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. 17,663, 18,070 ¶1124 n. 2247 (2011) (“*USF Transformation Order*”), these areas will be upgraded under the Mobility Fund Phase I requirements, and thus will not need to be upgraded again under Phase II. Some areas served by TERRA-SW will not be upgraded under the Phase I award, because they were not included in GCI bids or because GCI is not currently an ETC in the area that includes that census block.

TERRA-SW backhaul network, which was built through a combination of private capital and a grant/loan by the United States Department of Agriculture's Broadband Infrastructure Program. Without those facilities in place, GCI would not have had the infrastructure to support its bids. Furthermore, in the Bethel area, GCI already had a 2G wireless network in place, so it was not constructing new towers and other basic infrastructure. In contrast, the Yakutat area, which is not on the TERRA-SW network, had much higher costs per road mile and did not yet have an existing wireless network, and thus did not garner sufficient support to allow construction to go forward.<sup>7</sup>

In addition, the number of bidders in Phase I was exceedingly small, and thus it is likely that Phase II, with the award of recurring support, will have greater participation. Only 52 entities were qualified to bid in Phase I (with fewer still actually bidding), and a number of those were affiliates of the same company. Thus, it is likely that Phase II will be more competitive, which will make it even less likely that Alaska ETCs will be able to obtain a significant amount of support through the reverse auction. Accordingly, the results of Phase I do not provide any reason to believe that a nationwide Phase II auction will provide Alaska with the support needed to ensure that it does not fall even farther behind the rest of the country with respect to mobile services.

### **III. A REMOTE ALASKA MOBILITY FUND WOULD BETTER ASSURE UNIVERSAL SERVICE GOALS IN ALASKA.**

Rather than having Alaskan ETCs bid against ETCs in the rest of the country for Phase II support, which, as discussed above, puts the Alaskan ETCs at a horrific disadvantage that will

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<sup>7</sup> GCI was the winning bidder for a few census blocks in the Yakutat region. However, because the winning blocks did not cover the vast majority of this area, GCI did not have a critical mass of support to proceed with building out Yakutat with the commitment to deliver data at 768/200 kbps. GCI is moving ahead with a 2G deployment in Yakutat.

not serve the goal of maintaining reasonable comparability among mobile services, it would be better to establish a separate Alaska Mobility Fund. At a minimum, this should be comprised of all Remote Alaska CETC support being paid today and may need to be even greater given the amount of need for universal service high cost support to achieve statewide 768/200 mobile voice and broadband services and the fact that the demand under the existing Remote Alaska cap has already exceeded the available support by at approximately 10.5% based on the fact that the cap was set based on service provided in 2010 (which determined support paid in 2011) and did not account for continued subscriber growth related to prior deployments.<sup>8</sup>

Creating such a fund would have several advantages. First, the distribution of such support could be optimized as market conditions change. For example, several parts of Remote Alaska are served by wireless ETCs that receive legacy high cost support today, but that, with the advent of both Mobility Fund Phase II and Tribal Mobility Fund Phase II, would not by July 1, 2018. At that point, those areas would be served by an unsubsidized competitor. Furthermore, with Verizon Wireless poised to enter Alaska, some parts of Remote Alaska may have an unsubsidized competitor even more quickly. With an Alaska Mobility Fund, Phase II support could be shifted away from these areas to other parts of Alaska that are in need of support for either the expansion of voice service or upgraded mobile broadband services. Within such a fund, these shifts could be accomplished without adding to the high cost support budget.

Second, given the cost of upgrading the entire state to 768/200 mobile voice and broadband service, the Commission must give serious consideration to choosing between

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<sup>8</sup> See USAC 1<sup>st</sup> Quarter 2013 Appendix HC-01 (“Alaska state factor”), available at: <http://www.usac.org/about/tools/fcc/filings/2013/Q1/HC01-%20High%20Cost%20Support%20Projected%20by%20State%20by%20Study%20Area%20-%20201Q2013.xls> (last accessed Dec. 21, 2012).

supporting the deployment of mobile networks in rural areas and continuing to support wireline networks in those same areas, at least at the current levels. In Remote Alaska communities that are not connected to fiber networks either directly or by microwave, there is little likelihood that a mass market wireline broadband service will be faster than a mass market wireless service because throughput will be limited by the satellite backhaul capacity.<sup>9</sup> In these areas, the Commission must decide whether it will continue to allocate substantial and scarce high cost support to legacy wireline services—which consumers are abandoning in increasing numbers when mobile services become available—or to reallocate some or all of that support to mobile services.<sup>10</sup> Mobile services have significant advantages, particularly for public safety, because they can be used from anywhere the caller is, rather than just from fixed points. In off-road Remote Alaska communities, being able to make and receive calls when away from home is not just a convenience, but can be a matter of life or death. Without a significant differential in broadband speeds, the public interest balance weighs strongly in favor of prioritizing mobile wireless over legacy wireline networks. A separate Alaska Mobility Fund would allow the Commission to do that, without affecting the Phase II distributions in the rest of the country.

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<sup>9</sup> Other alternatives exist for serving enterprise users, including VSATs. GCI has used satellites to deliver high capacity services to enterprise customers, including schools and rural health clinics, for years. Terrestrial delivery is preferable for these users, but given the small populations of those parts of Remote Alaska that lack access to the National Highway System, the mass market will not sustain the construction of terrestrial middle mile.

<sup>10</sup> The allocation between wireless and wireline itself might be determined through a competitive bidding mechanisms.

**IV. THE COMMISSION SHOULD CONTINUE TO DETERMINE ELIGIBILITY AT THE CENSUS BLOCK LEVEL, BUT SHOULD CREATE AN EXCEPTION IF THE LARGEST COMMUNITY IN THE BLOCK LACKS SUFFICIENT SERVICE. (Section III.A)**

In GCI's experience, the centroid approach for determining whether a block is served or unserved generally makes sense. However, there can at times be anomalous results. In order to correct for those, in part, if the largest community in the block is not in the centroid, the test for whether the block is served or unserved should use the largest community.

**V. PHASE II SHOULD PRIORITIZE AREAS THAT LACK ACCESS TO THE NATIONAL HIGHWAY SYSTEM. (Section III.B)**

As GCI stated in its initial comments, the Commission should prioritize awards to areas that lack access to the National Highway System.<sup>11</sup> Access to the National Highway System by road or auto ferry is a strong proxy for areas that should have access to terrestrial backhaul facilities, either through fiber or microwave. In Alaska, the National Highway System runs a loop between the Anchorage region and the Fairbanks region. Communities along these highways generally have fiber backhaul or are readily connected by microwave to the fiber backhaul. Mobile broadband service deployments will be generally easier in these areas, both because of ready access to rights-of-way, but also access to electric power. These areas are the most likely candidate for entry by an unsubsidized provider.

By contrast, those areas of Alaska that are not on the road system, other than in the communities on the TERRA-SW network, are generally connected by satellite backhaul to the Anchorage area. These off-road communities are more likely to be entirely unserved by wireless, and are unlikely to be served by an unsubsidized provider. The population of these communities is too low and the costs of serving these communities, particularly the backhaul

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<sup>11</sup> See GCI Comments at 17-19.

costs, are simply too high to make unsubsidized service feasible. Prioritizing areas that lack access to the National Highway System increases the likelihood that these areas can obtain the support necessary to maintain, let alone expand, service.

The most practical way to create this priority is through a bidding credit. GCI therefore recommends that the Commission apply a 25 percent bidding credit preference for areas that lack access to the National Highway System. This is in the same range of other credits that the Commission is considering, and would increase the likelihood that these rural areas would receive the support necessary to maintain and expand service.

**VI. THE COMMISSION SHOULD USE ROAD MILES, AND SHOULD INCLUDE ALL TERTIARY ROADS AND TRAILS. (Section III.C)**

For Phase I, the Commission included within the definition of road miles not just primary, secondary, and local and rural roads and streets, but also 4 wheel drive vehicular trails, service dries, and private roads for service vehicles.<sup>12</sup> The Commission should again include all these categories of roads, and should provide a way in which Alaskans can be sure that these include all the intervillage snowmachine trails. If feasible, it would also be good to add navigable river miles. That would capture the situation in which navigable rivers are used in lieu of roads, which can be the case in the parts of Remote Alaska that lack connection to the National Highway System.

GCI notes that, although census blocks are individual bidding units in Alaska, there is an issue with evaluating the public interest obligation. The calculation of road coverage should be based on all blocks awarded to a single bidder within a census tract. This reduces the complexity

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<sup>12</sup> See *Mobility Fund Phase I Auction Scheduled for September 27, 2012, Notice and Filing Requirements and Other Procedures for Auction 901*, Public Notice, DA 12-641, 27 FCC Rcd. 4725, 4739 ¶ 24 (2012).

of allocating miles of the shared roads bordering each block. Additionally, when road miles in an evaluation unit are extremely low—as little as a few hundred feet—the inability to serve even a small portion of roadway, because of a gulley or buildings, can render an ETC unable to meet the road mile percentage buildout requirements. In Alaska, for Phase I, it appears that each census block might be examined separately to determine if the provider has met the buildout requirement for that block, which presents a good deal of complexity and uncertainty. By contrast, in census tracts, the aggregate road miles covered in all blocks in the tract as a whole are examined to determine if the provider has met the requirement. For Alaska, even though the bidding unit is the census block, it would thus make more sense to aggregate all awarded census blocks within a tract for the purposes of determining compliance with buildout requirements.

**VII. AREAS SERVED ONLY BY SATELLITE BACKHAUL SHOULD HAVE REDUCED BROADBAND PERFORMANCE REQUIREMENTS FOR THE FIRST FIVE YEARS. (Section III.D)**

When GCI models the cost of upgrading Alaska statewide to 768/200 mobile voice and broadband service, the largest cost component by far is backhaul. This does not include the cost of constructing new terrestrial backhaul facilities, rather than using whatever satellite backhaul can be obtained—if it can be obtained.

The reality is that implementing 768/200 service in all parts of the state would likely require a large number of transponders, which may not be possible to obtain. In order to rationally mitigate that, the Commission should either set a lower performance requirement for areas that can be served only through satellite backhaul, or it should provide for an extended transition to those speed levels. Until terrestrial backhaul networks are more fully deployed, reaching 768/200 throughput to the Internet from a satellite-served Alaskan village will be extremely difficult and costly.

To ease this burden, GCI proposes a five-year interim requirement of 512/128 for areas that can be served only through satellite backhaul. This would provide a gradual transition process to 768/200, easing the burden on Alaskan providers who face higher costs in providing bandwidth due to Alaska's low population density.

**VIII. TRIBAL CREDITS SHOULD FOCUS ON SERVICE TO TRIBAL AREAS RATHER THAN TRIBAL OWNERSHIP. (Section VI)**

As GCI stated in its initial Comments, the Commission's proposals with respect to Tribal issues will not work to bring ubiquitous mobile broadband to Alaska.<sup>13</sup> In fact, some of the Commission's proposals would only add unnecessary complexity and uncertainty without providing positive results. However, the Commission's "priority units" or bidding credit approaches could work if applied to Tribal lands or all providers serving Remote Alaska.

The Commission's proposal to allocate "priority units" to Tribal governments rather than providers who might ably fulfill the need given sufficient funding is a recipe for ineffective and wasteful support.<sup>14</sup> First, such a proposal is unlikely to address situations in which there is widespread lack of 3G or 4G mobile broadband. It is very unlikely that a single island of 3G mobile broadband would be viable even over the short-term, much less the long-term, and GCI questions whether a single island of service within a Tribal area is an appropriate goal.<sup>15</sup>

In addition, such a system would not work in Alaska, because it does not reflect how Congress resolved Alaska Native land claims, or the unique governance structure of Alaska

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<sup>13</sup> See GCI Comments at 19-21. The proposals are set forth at *USF Transformation Order*, 26 FCC Rcd. at 18,080-82, ¶¶ 1165-1172.

<sup>14</sup> See GCI Comments at 19-21.

<sup>15</sup> See also Comments of The Alaska Telephone Association, Alaska Communications, and General Communication, Inc., WT Docket No. 10-208, at 3 (filed May 4, 2011).

Tribal governments.<sup>16</sup> The Commission’s proposal to address the “unique Alaska Native government structure and the large number of Alaska Native Villages likely to be clustered in any given geographic area” by “allocat[ing] priority units proportionately, according to the relative size and/or number of unserved units of all Alaska Native Villages in any given geographic area”<sup>17</sup> may or may not adequately address the complexities with respect to Tribal populations in Alaska, but is sure to create subscale opportunities for participation that would fail to produce any reasonable expectation for a long-term, efficient service solution, given the already substantial constraint on funding resources.

Nevertheless, if the Commission were to institute a “priority units” designation process, GCI recommends that the Commission allocate “priority units” to Tribal lands—not Tribal governments—and allow the most efficient provider, whether tribally-owned or not, to

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<sup>16</sup> Congress addressed the land claims of Alaska Natives differently than it did with respect to native land claims in the Lower 48. Alaska claims were settled by Congress in the Alaska Native Claims Settlement Act, Pub. L. No. 92-203, 85 Stat. 688-716 (“ANCSA”), enacted in 1971. ANCSA divided Alaska into twelve geographical regions, and provided for the establishment of multiple for-profit Alaska Native Village Corporations and a single for-profit Alaska Native Regional Corporation in each region. The Village Corporations own the surface estate of the lands granted to them under ANCSA; each Regional Corporation owns the subsurface estate of the lands granted to the Village Corporations in its region. ANCSA also granted surface and subsurface lands and other rights directly to the Regional Corporations.

While there are more than 200 Alaska Native entities included on the list of federally recognized tribes updated periodically by the Bureau of Indian Affairs pursuant to the Federally Recognized Indian Tribe List Act, Pub. L. No. 103-454, 108 Stat. 4791, § 103, the listed entities generally are not the Regional or Village Corporations. As a result of ANCSA, Alaska Native villages that have been recognized by the federal government—as opposed to the Village or Regional Corporations—generally do not own land. In this respect, Alaska is very different from areas in the Lower 48 where tribes own and have legislative jurisdiction over particular reservation lands. *See also id.*

<sup>17</sup> *USF Transformation Order*, 26 FCC Rcd. at 18,081, ¶ 1171.

competitively win support. This will be more likely to create an integrated mobile wireless network, rather than supporting a subscale, isolated service.

As GCI also stated in its initial comments, it does not support the proposal to apply a 25 percent bidding credit preference for Tribally-owned or controlled providers in Phase II,<sup>18</sup> and does not believe that such a bidding credit would provide any benefit to Alaska.<sup>19</sup> First, as a threshold matter, according to the Commission, there are currently only eight Tribally-owned and controlled ETCs nationwide, none of which are in Alaska.<sup>20</sup> GCI also is unaware of any Tribally-owned or controlled entity in Alaska that could be eligible for ETC designation. Furthermore, such a system would hamstring Tribal governments with respect to any allocation of a specified number of “priority units” to Tribal governments, forcing them to use credits only on tribal-owned/controlled providers, rather than allowing the credits to go to the most efficient provider, even if it is not tribally owned or controlled.

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<sup>18</sup> See *USF Transformation Order*, 26 FCC Rcd. at 18,080, ¶ 1166.

<sup>19</sup> See GCI Comments at 20.

<sup>20</sup> See *USF Transformation Order*, 26 FCC Rcd. at 17,823 ¶ 490, n.814. See also *Improving Communications Services for Native Nations*, Notice of Inquiry, FCC 11-30, 26 FCC Rcd. 2672, 2679-80 ¶12 n.46 (rel. Mar. 3, 2011): “The eight Tribally-owned local exchange carriers with ETC designations are: Hopi Telecommunications, Inc. (Hopi Tribe); San Carlos Telecommunications and Utilities, Inc. (San Carlos Apache Tribe); Mescalero Apache Telecommunications, Inc. (Mescalero Apache Tribe); Gila River Telecommunications, Inc. (Gila River Indian Community); Saddleback Communications (Salt River Pima Maricopa Indian Tribe); Fort Mojave Telecommunications, Inc. (Fort Mojave Indian Tribe); Tohono O’odham Utility Authority (Tohono O’odham Nation); and Cheyenne River Sioux Tribe Telephone Authority (Cheyenne River Sioux Tribe). The Commission performed the majority of these ETC designations. Mescalero Apache Telecommunications, Inc. received its ETC designation from the New Mexico Public Regulatory Commission. Standing Rock Telecommunications, Inc. (Standing Rock Sioux Tribe) is the Tribally-owned wireless company, and received its ETC designation from the Commission.” Of course, that list may not be exhaustive and does not exclude future such entities.

**IX. CONCLUSION.**

The Commission should create a separate Alaska Mobility Fund Phase II, rather than trying to address Alaska within the context of the rest of the country. The Mobility Fund Phase I results show that Alaska will likely receive little support in a reverse auction, which would leave Alaska forever on the wrong side of a wireless mobile voice and broadband divide. Creating a separate fund allows the Commission to address Alaska-specific issues on a more elegant and targeted basis.

Respectfully submitted,



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