



June 10, 2013

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
2550 M Street, NW
Washington, DC 20037

Re: Notice of Ex Parte – AU Docket No. 13-53

Dear Ms. Dortch:

On June 6, 2013, Chris Nierman and I, on behalf of General Communication, Inc. (“GCI”), spoke with Geoffrey Blackwell of the Office of Native American Programs and Margaret Wiener, Patricia Robbins, Kirsten Kube, Eliot Maenner, Bill Huber, Craig Bomberger, and Martha Stancill, all of the Wireless Telecommunications Bureau, about the above-captioned docket.

First, Mr. Nierman pointed out that the definition of “Tribal lands” contained in the Tribal Mobility Fund auction procedures Public Notice limits auction eligibility in Alaska only to the Annette Island Reservation and Alaska Native Village statistical areas. This revised definition contradicts the definition adopted in the Order, as well as long-standing Commission precedent defining “Tribal lands” to include all Alaska Native Regions established pursuant to the Alaska Native Claims Settlement Act. Mr. Nierman also explained that the redefinition would exclude 500 census blocks and 10,000 residents of Alaska Native lands, who would be eligible under the former definition, from eligibility.

Second, the attendees discussed alternative ways to achieve lower administrative burdens while also addressing Alaska’s uniquely large and numerous census blocks. Mr. Nierman suggested allowing bidders to aggregate contiguous census blocks to form a bidding area or auctioning bids by census tract, as is done elsewhere in the country. Another possibility discussed would prescribe bidding on the census block level, but allow winning bidders to group contiguous winning bids for application and performance obligation purposes. Mr. Nierman also suggested requiring a Letter of Credit for each winning bidder, instead of each winning bid.

Attached, please find a map of Alaska, detailing the areas that will be excluded from eligibility under the definition of “Tribal lands” contained in the Public Notice of March 29, 2013, as well as the spreadsheet upon which it is based.

Respectfully submitted,

/s/

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