Alaska Telephone Association

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BY ELECTRONIC FILING

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

Re: *Connect America Fund, High-Cost Universal Service Support,*
WC Docket Nos. 10-90, 05-337

Dear Ms. Dortch:

The Alaska Telephone Association ("ATA") supports the July 9 Letter of Alaska Communications Systems ("ACS") in the above-captioned proceedings concerning the Connect America Fund ("CAF") Phase II program.[1] In the July 9 Letter, ACS proposes several Alaska-specific adjustments to the Connect America Cost Model ("CAM") under development by the Wireline Competition Bureau.

ATA supports the conclusion that the CAM currently does not reflect Alaska-specific cost inputs, and produces an unreasonably low amount of support for the ACS price cap LECs, which provide service only in Alaska. ACS has thoroughly documented the unique cost-causative characteristics of deploying and operating networks in Alaska, and identified a number of specific respects in which the CAM falls short. ATA supports the proposals set forth in ACS's July 9 letter addressing Alaska-specific adjustments to the model inputs, as well as the need for the CAM to include the costs of a submarine fiber optic cable system to connect Alaska to the nearest Internet peering locations in the lower 48 states. In addition, ATA supports ACS's request that the Bureau provide ACS additional time to meet its obligations under the CAF Phase II program.

Sincerely,

James Rowe

[1] Letter to Marlene H. Dortch, FCC Secretary, from Leonard A. Steinberg of ACS, in WC Docket Nos. 10-90, 05-337, filed July 9, 2013 ("July 9 Letter").