
Alaska Telephone Association

Michael Garrett
President

201 E. 56th, Suite 114
Anchorage, AK 99518
(907) 563-4000
FAX (907) 562-3776
www.alaskatel.org

James Rowe
Executive Director
jrowe@alaskatel.org

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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 30 Supplemental Letter of Alaska Communications Systems (“ACS”) in the above-captioned proceedings concerning the Connect America Fund (“CAF”) Phase II program.^[1] In the July 30 Letter, ACS provides additional Alaska-specific data to support adjustments to the Connect America Cost Model (“CAM”) under development by the Wireline Competition Bureau.

ATA members appreciate the recent relief for the Alaskan rate of return carriers provided by the Federal Communications Commission and continue to support Alaskan Communications’ efforts to update and provide data affirming the conclusion that the CAM currently does not reflect Alaska-specific cost inputs and produces an unreasonably low amount of support for Alaskan carriers. 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.

^[1] Letter to Marlene H. Dortch, FCC Secretary, from Leonard A. Steinberg of ACS, in WC Docket Nos. 10-90, 05-337, filed July 30, 2013 (“July 30 Letter”).

ATA supports additional data as set forth in ACS's July 30 letter addressing Alaska-specific adjustments to the model inputs and reiterates that these measures may still be insufficient for building a network in Alaska.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Rowe". The signature is written in a cursive style with a long, sweeping underline that extends to the right.