

Alaska Telephone Association

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Federal Communications Commission
Marlene H. Dortch, Secretary
445 12th St. S.W.
Washington, D.C. 20554

RE: Adak Telephone Utility Petition for Limited Waiver of the Commission's Intercarrier Compensation Revenue Recovery Rules for Rate-of -Return Carriers, CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51; WC Docket Nos. 03-109, 05-337, 07-135, 10-90; WT Docket No. 10-208

Dear Ms. Dortch:

The Alaska Telephone Association supports the limited waiver filed on behalf of Adak Telephone Utility¹ to correct an inadvertent error made in the calculations of its Base Period Financial Year 2011 intrastate revenues.

In Alaska, where most of the telecommunications providers are small and remote by national standards, Adak Telephone Utility is among the smallest and most remote. Revenue shortfalls, the result of miscalculation that might be easily absorbed by a more sizable company, are significant to Adak. An inadvertent error in calculation, whether advantageous or disadvantageous, should be corrected regardless of the size of the effected entity, however due to the size of this entity, the consequences could be severe. We trust that if the Wireline Competition Bureau concurs with the finding of an inadvertent error, it will remedy that error by adjusting support revenues, both past and future, to the amounts that would be correct had the initial error been avoided.

Respectfully submitted,



¹ Petition of ADAK Telephone Utility for Limited Waiver of 47 C.F.R. § 51.917(b)(7)(ii), CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WC Docket Nos. 03-109, 05-337, 07-135, 10-90, WT Docket No. 10-208 (filed May 30, 2013).