



August 29, 2013

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **WC Docket No. 10-90**
Connect America Fund
WT Docket No. 10-208
Universal Service Reform – Mobility Fund

Dear Ms. Dortch:

This letter is intended to illustrate how universal service saves lives, even in the most remote and rugged areas of the United States. According to the Federal Communications Commission’s (“FCC” or “Commission”) most recent mobile wireless competition report, at least 25 percent of the geography of the United States lacks basic wireless coverage from even one mobile service provider.¹ While the number of Americans permanently living in these remote and rural markets is relatively small, that does not mean these markets are completely void of human activity. In fact, quite the opposite is true, and the Copper River valley in Alaska is a classic example.²

¹ *In the Matter of Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Reporting and Analysis with Respect to Mobile Wireless, Including Commercial Mobile Services*, WT Docket No. 11-186 (Terminated), FCC 13-34 (released March 21, 2013) (“*Sixteenth Report*”) at p. 6.

² The Copper River valley, also known as the Copper River Basin, encompasses approximately 20,649 square miles and is bounded by the Chugach National Forest to the south, the Alaska Range to the north, and the Wrangell-St. Elias National Park and Preserve to the east, and the Talkeetna and Chugach Mountains to the west. The Copper River, one of the largest rivers in North America, has its headwaters in Copper Lake, at the base of the Wrangell Mountains and dissects the region, flowing 250 miles to the Gulf of Alaska near Cordova. The major population centers of the Copper River Basin are located in the communities of Glennallen, Copper Center and Kenny Lake. Glennallen is the major commerce and administrative center for the region with major medical services, a library, the region’s two largest schools and the campus of the Prince William Sound Community college. The Copper River School District and Ahtna, Inc, (one of the 12 regional native corporations in Alaska) have offices in Glennallen, along with the Glennallen Job Center, the Alaska State Troopers, the Alaska Department of Fish and Game, the Alaska Department of Natural Resources, Division of Forestry, and the main maintenance facility for the Alaska Department of Transportation and Public Facilities. The National Park Service’s main office for the Wrangell St. Elias National Park is located just south of Glennallen. Other smaller communities in the region offer remote village lifestyle with subsistence activities supplementing



As the Commission is well aware, the cost of providing even basic mobile wireless service in rural Alaska is extremely expensive. Without access to universal service support, carriers like Copper Valley Wireless, LLC (“Copper Valley Wireless”) are limited in both the total number of cell sites that can be deployed and the geographic reach of those cell sites. The critical need for mobile wireless service in areas where people are not able to contact public safety either because there is no service, or the existing level of service is not reliable, is well established.³ Last month, yet another human life was saved thanks to a timely 911 emergency call that was connected to first responders via a remote Copper Valley Wireless cell site located at Cannon Hill, in Chitina, Alaska.⁴ We can say with confidence that without support from universal service funding, this particular cell site would not have been deployed, and very likely, a resident of Alaska would have prematurely lost his life. The FCC must work to adopt rules that ensure the continued funding to rural wireless carriers that operate the only wireless facilities in these remote areas. Universal service funding in these areas is critical to continuing life-saving coverage.

On July 3, 2013, David Bruss, a resident of Chitina, Alaska, was dip-net fishing on the Copper River with family friends; siblings Hannah Carlson, Leah Carlson, Isaiah Carlson, and their friend Adrienne Clingenpeel. After departing shore alone in his motorized-kayak to return to their camp at the confluence of the Copper River and O’Brien Creek, Mr. Bruss’s kayak got caught in an eddy and was quickly overturned by the powerful current. In the blink of an eye, David Bruss was tossed into the frigid, silt-filled waters of the raging Copper River.

Mr. Bruss’ companions witnessed the capsizing of his kayak and immediately began dialing 911, recognizing the life-and-death situation unfolding before their eyes. Using the mobile phone of Leah Carlson, Adrienne Clingenpeel was able to place an emergency call with the Alaska State Troopers. Hannah Carlson was also able to place a call to the Alaska State Troopers office in Palmer, via 911. This life-saving 911 call was placed at 7:06pm from inside the Copper River valley. Specifically, the emergency call was routed from the Cannon Hill cell site in Chitina, Alaska, sent via fiber backhaul to the Copper Valley Wireless switch located in Glennallen, Alaska, and eventually connected to the Alaska State Troopers dispatch center in Palmer, Alaska. However, the

livelihoods. Recreation opportunities include fishing, hunting, skiing, canoeing, river-floating, snow machining, boating, backpacking, horseback riding, dog-mushing and camping.

³ See, e.g., Letter from Senator John D. Rockefeller IV, Chairman, Senate Committee on Commerce, Science, and Transportation, to Julius Genachowski, Chairman, FCC (August 2, 2010) (detailing the communications problems experienced by citizens and Public Safety workers during the Big Branch mine disaster in West Virginia due to “inadequate communications infrastructure”).

⁴ “Alaska Fisherman Survives Frigid 4-Mile Float Down Copper River After Boat Capsizes,” Alaska Dispatch (July 5, 2013); see <http://www.alaskadispatch.com/article/20130705/alaska-fisherman-survives-frigid-4-mile-float-down-copper-river-after-boat-capsizes#.Ue2DhNQ5P60.email> (last viewed July 24, 2013).



initial outgoing 911 call using Copper Valley Wireless's service was only the first instance that day of the utility of this absolutely vital cell site. Once the Alaska State Troopers dispatch received the plea for help, it was immediately able to contact the closest Alaskan State Trooper. Knowing that time was of the essence, and relying on his personal knowledge of area residents, Trooper Ben Endres wasted no time in placing his own mobile-to-mobile call -- once again using Copper Valley Wireless service -- to charter captain and fellow Copper Valley Wireless customer Mark Hem at the remote O'Brien Creek camp. Because he was on-shore at that precise moment, Mark Hem too made a mobile-to-mobile call to yet another local resident, Sam McCalister, who along with his fishing crew just happened to be in a boat downriver from Mr. Bruss' likely location. After 26 horrific minutes in nearly freezing and fast-moving water, David Bruss was pulled from the Copper River and his life saved.

The professionalism and heroic efforts exhibited by all the individuals named in this letter played a huge role in the fact that David Bruss of Chitina, Alaska is grateful to be alive today. But the fact remains that, without the ability of three separate individuals making three separate calls in three equally remote locations using a Copper Valley Wireless cell site that is supported by universal service funds, there would be no happy ending to this story.

Copper Valley Wireless strives daily to deliver mobile wireless services to a corner of the United States that is both majestically beautiful but exceedingly rugged. Where our urban and suburban counterparts use buried electric lines, roof-top antennas, and service vans, Copper Valley Wireless engineers and technicians use propane generators, helicopters and mountain-top towers. But all of these technological marvels come at a great cost -- a cost that can only be overcome with sufficient, but ultimately supplemental, universal service fund support. A remote cell tower deployed and maintained using universal service support saved the life of David Bruss on July 3, 2013. The FCC should strive to formulate the rules going forward that ensure that remote cell sites continue to be supported. In weighing the cost of this support with the cost of saving human lives day in and day out, the FCC must continue to be diligent in ensuring adequate funds are available.

Respectfully submitted,

/s/ Shilah Butler

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