

ATTACHMENT

Ex Parte Letter of Alaska Communications Systems January 29, 2014;
Connect America Fund, WC Docket No. 10-90;
Universal Service Reform – Mobility Fund, WT Docket No. 10-208;
Rural Health Care Support Mechanism, CC Docket No. 02-60;
Modernizing the E-Rate Program For Schools & Libraries, WC Docket No. 13-184

Declaration of Caitlin McDiffett, Alaska Communications Systems

1. I am a Product Manager with Alaska Communications Systems. In that capacity I research and compare the voice and broadband services offered by Alaska service providers, including those offered by GCI.
2. I have reviewed the characterization of GCI's broadband offerings set forth on pages 5-6 of the January 29, 2014 Letter to Marlene H. Dortch from Karen Brinkmann, Counsel to Alaska Communications Systems, in WC Docket Nos. 10-90 *et al.*, and it accurately describes the broadband rates and fees charged by GCI as well as the usage limits imposed by GCI that frequently result in overage charges to customers.
3. Many Alaska consumers have brought their GCI broadband bills to ACS for a comparative quote, providing dozens of examples of GCI overage charges. Many of these examples include overage charges of \$200 to \$600 in a single month. In one instance, a customer was charged \$1,200 in overage fees in a single month.
4. For the customer purchasing 12 Mbps, the usage limit is 60 GB – the equivalent of two movies per week – with an overage charge of \$0.004 per MB above the limit.
5. GCI reported 2012 Home Internet revenue of \$86 million of which \$7.9 million (nearly ten percent) was derived from overage charges. On average, about \$5 per customer per month can be attributed to GCI overage charges.
6. GCI imposes usage limits or data caps at every level of Home Internet service, from its 10 Mbps service (10 GB limit, \$0.005/MB overage charge) to its 100 Mbps service (500 GB limit, \$0.0005/MB overage charge).
7. A customer purchasing 12 Mbps for standalone (non-bundled) Home Internet from GCI pays \$59.99 per month plus \$11.99 monthly "access" fee for a total of \$71.98 per month with a 60 GB usage limit (\$0.004/MB overage charge). Thus, the monthly bill for this service is more typically \$76.98, including a \$5.00 overage charge. To purchase a service with a usage limit of at least 100 GB per month, a GCI customer would have to pay \$81.98 per month (the \$69.99 standalone rate plus \$11.99 monthly access fee), subject to an overage charge of \$0.003/MB. ACS's 4 Mbps broadband offering at \$89.00 per

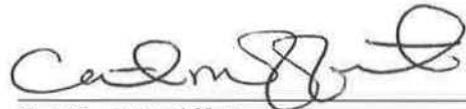
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month with no usage limit, access fees or overage fees, compare favorably to these GCI plans.

The foregoing is true and complete as of the date hereof to the best of my information, knowledge and belief.

January 29, 2014


Caitlin McDiffett