

May 12, 2014

Ex Parte

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

Re: *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184

Dear Ms. Dortch:

On May 8, 2014, Tina Pidgeon and Chris Nierman of General Communication, Inc. (“GCI”), and I, on behalf of GCI, met with Amy Bender, Wireline Legal Advisor to Commissioner O’Rielly, and Daniel Alvarez, Wireline Legal Advisor to the Chairman. On May 9, 2014, Tina Pidgeon met with Commissioner Rosenworcel, and Mr. Nierman and I met with Rebekah Goodheart, Wireline Legal Advisor to Commissioner Clyburn, and Ms. Pidgeon, Mr. Nierman and I met with Nicholas Degani, Wireline Legal Advisor to Commissioner Pai. We provided the FCC attendees with a copy of the attached charts, which show various statistics for rural Alaskan schools served by GCI. As shown on those charts, there is a substantial difference between the amount of bandwidth per student being provided in schools with access to fiber middle mile, as compared with those that are served with either microwave or satellite-based middle mile. These charts also show how the average bandwidth price per megabit has declined over time, although it is still substantial due to Alaska’s unique geography, climate and demographics.

We discussed GCI’s Priority 0 proposal, which is meant to ensure that connectivity from the fiber-based Internet to distant rural communities remains supported and affordable as the Commission reforms E-rate. The Priority 0 proposal is compatible with a variety of proposed E-rate reforms, as they would apply within a community and school to reach the student. We acknowledged that if Priority 1 services remain fully supported, the need for Priority 0 would be less pressing. However, at least some of the proposals being floated could significantly limit the amount of support available for schools that require long middle-mile connections to reach the Internet. While GCI does not have the data to estimate the amount of Priority 0 support with precision, the amount of Priority 1 support requested by schools classified as “Rural” under the National Center for Educational Statistics locale codes is approximately \$500 million. This

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overstates the actual amount of requests for Priority 0 services, because it also includes the costs of delivering bandwidth within the community to the school.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata". The signature is fluid and cursive, with a long horizontal stroke at the end.

John T. Nakahata

Counsel to General Communication, Inc.

cc: Commissioner Rosenworcel
Daniel Alvarez
Amy Bender
Nicholas Degani
Rebekah Goodheart

Attachment

Broadband in Alaska's Rural Schools

