



Dykema Gossett PLLC  
4000 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402

WWW.DYKEMA.COM

Tel: (612) 486-1900

**Erik B. Levy**

Direct Dial: (612) 486-1906

Direct Fax: (866) 770-4906

Email: ELevy@dykema.com

June 16, 2014

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

Re: Ex Parte Communication with Nicholas Degani

Dear Ms. Dortch:

On June 12, 2014, members of the Alaska Rural Coalition (“ARC”) met with Commissioner Pai’s Legal Advisor Nicholas Degani in Washington D.C. Shannon Heim of Dykema Gossett participated in person. Myself, Dave Dengel of Copper Valley Telephone, Steve Merriam and Clover McNeil of Arctic Slope Telephone Association Cooperative, Michael Burke of Burke Watson, Inc., Doug Neal of OTZ Telephone Cooperative, Dan Lindgren of Ketchikan Public Utilities, Brenda Shepard and Bob Dunn of TelAlaska, Mike Megli and Michael Favors of Nushagak Electric and Telephone Cooperative, Jeff Smith of GVNW Consulting, Christine O’Connor and Wanda Tankersley of MTA participated telephonically.

Our discussion focused on several aspects of the recent 7<sup>th</sup> Order on Reconsideration and Further Notice of Proposed Rulemaking, released on June 11, 2014. Our discussion included: (1) the status of the Rural Broadband Experiments; (2) the letter of credit proposal in the Further Notice of Proposed Rulemaking; (3) the middle mile construction proposal on Tribal Lands; and (4) the local rate floor data collection by USAC. We articulated the ARC’s continued support for flexibility in the letter of credit requirement, the need for middle mile support and our discomfort with the local rate floor.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS. If you have any questions or I may be of assistance, please do not hesitate to contact me. Thank you.

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Sincerely,

**DYKEMA GOSSETT PLLC**

/s/  
Erik B. Levy

EBL

cc: Nicholas Degani

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