



June 23, 2014

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, D.C. 20554

RE: **Ex parte filing** in WC Docket No. 10-90

Dear Ms. Dortch:

On June 23, Dave Dengel from Copper Valley Telephone and Steve Merriam from Arctic Slope Telephone Association Cooperative (ASTAC) and the undersigned from GVNW Consulting, Inc. (GVNW) conducted an ex parte meeting with Amy Bender from Commissioner O’Rielly’s office.

In its response to questions in the House Energy and Commerce White Paper “Modernizing U.S. Spectrum Policy”, Comptel stated at page 1: It is also important to emphasize that the **wireless and wireline markets are inextricably linked given the growth in applications and services that require tremendous amounts of bandwidth**. The advances in wireless, specifically 4G/LTE in today’s marketplace, depend on the wireline network to handle the tremendous increase in data consumption that is predicted in the coming years. Cisco estimates that “[b]y 2017, almost 21 exabytes of mobile data traffic will be offloaded to the fixed network by means of Wi-Fi devices and femtocells each month. (**Emphasis added**)

This ex parte meeting consisted of a discussion of the steps that Copper Valley and ASTAC are engaged in to increase capacity and bandwidth available to its customers; to discuss implications of the 7<sup>th</sup> Order on Reconsideration, including the Remote Area Fund; and to discuss the following excerpt from the 7<sup>th</sup> Order on Reconsideration: .

At paragraph 122 of the 7<sup>th</sup> Order on Reconsideration portion of FCC 14-54, the language states in part that: *Further, incumbent LECs recover the costs associated with many of those obligations from other sources. [Citing footnote 268] In footnote 268, the language includes the sentence: Moreover, incumbent LECs that opt out of the broadband public interest conditions can request other means of cost recovery (e.g., rate increases, state universal service funding, etc.) from the relevant regulatory body (i.e., a state commission or the Federal Communications Commission) to compensate for reductions in their high-cost universal service support to the extent actually needed.*

We discussed how this statement in the 7<sup>th</sup> Order on Reconsideration does not reconcile with a concept of setting a sunset date for the jurisdictional separations rules.

As required by the Commission's rules, this ex parte record is now filed in the above referenced docket. If there are any questions, please call me on 503.612.4409.

Respectfully submitted,

Via ECFS 6/25/14

Jeffrey H. Smith  
President and CEO

Copy to  
Amy Bender, FCC  
Dave Dengel  
Steve Merriam