

July 7, 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 July 2, 2014, Christopher Nierman, of General Communication, Inc. (“GCI”), and I, on behalf of GCI, met separately with Daniel Alvarez, Wireline Legal Advisor to the Chairman, Priscilla Argeris, Legal Advisor to Commissioner Rosenworcel, Amy Bender, Wireline Legal Advisor to Commissioner O’Rielly, and Nicholas Degani, Wireline Legal Advisor to Commissioner Pai, regarding the above-referenced proceeding. We reiterated that, for Alaska, the need to procure transport from a remote community to Anchorage was the highest priority for E-rate support. These long transport distances to reach a fiber hub are unlike any other place in the United States. Accordingly, in the event of a funding shortfall between Priority One telecommunications services and new support for Wi-Fi-based internal connections, the Priority One telecommunications services should take precedence. Otherwise, schools and libraries could be left with high-capacity internal connections, but without the resources to reach from the community back to an Internet aggregation point.

We understand that there are projections such that there might not be a funding shortfall for Priority One service, but the uncertainty as to years three to five in particular could have an immediate impact, as schools and libraries generally enter into three-year term contracts in order to obtain the most advantageous pricing. Maintaining first priority for Priority One services—or establishing a Priority 0 for remote transport, as GCI has proposed¹—preserves contracting certainty for the recurring telecommunications services support, with the outyear uncertainty borne by what is apparently one-time (or single application) support for Wi-Fi connections.

¹ See Corrected Comments of General Communication, Inc., WC Docket No. 13-184 (filed Sept. 18, 2013); see also Reply Comments of General Communication, Inc., WC Docket No. 13-184 (filed Nov. 8, 2013); Comments of General Communication, Inc., WC Docket No. 13-184 (filed Apr. 7, 2014).

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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: Priscilla Argeris
Daniel Alvarez
Amy Bender
Nicholas Degani

Attachment