SQUIRE PATTON BOGGS

Squire Patton Boggs (US) LLP
2550 M Street, NW
Washington, DC 20037

O +1 202 457 6000
F +1 202 457 6315
squirepattonboggs.com

Monica S. Desai
T +1 202 457 7535
monica.desai@squirepb.com

July 25, 2014

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

Re: **Notice of Ex Parte – WC Docket No. 10-90 and WT Docket No. 10-208**
Adak Eagle Enterprises and Windy City Cellular

Dear Ms. Dortch:

Monica Desai of Squire Patton Boggs (US) LLP, counsel to Adak Eagle Enterprises, LLC (AEE) and Windy City Cellular, LLC (WCC) (collectively, the Companies), as well as Larry Mayes, President and Chief Executive Officer, Adak Telephone Utility, and Andilea Weaver, Chief Operating Officer, Adak Eagle Enterprises, met with a number of FCC staff to emphasize that the interim funding granted to the companies in February runs out in one week – on July 31, 2014 – and to discuss the status of the companies' Application for Review and Petition for Reconsideration related to their petitions for waiver of the per line monthly caps on high-cost universal service support.[1] On June 23, 2014, the Companies met with Amy Bender (Legal Advisor, Office of Commissioner O'Rielly) and Nicholas Degani (Legal Advisor, Office of Commissioner Pai). On June 24, 2014, the companies held meetings with Priscilla Argeris (Legal Advisor, Office of Commissioner Rosenworcel), and Rebekah Goodheart (Legal Advisor, Office of Commissioner Clyburn). The companies also held a separate meeting on June 24, 2014 with Philip Verveer (Senior Counselor, Office of the Chairman), Daniel Alvarez (Legal Advisor, Office of the Chairman), Carol Mattey (Acting Chief, Wireline Competition Bureau), Michael Janson (Front Office Legal Advisor, Wireless Telecommunications Bureau), and Suzanne Yelen (Assistant Chief, Industry Analysis and Technology Division, Wireline Competition Bureau), which was also attended by Larry Harris of Squire Patton Boggs (US) LLP.

[1] *See* Application for Review, AEE and WCC, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Aug. 14, 2013) ("Application for Review"); *see also* Petition for Reconsideration, AEE and WCC, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Aug. 14, 2013) ("Petition for Reconsideration").

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During the meetings, the Companies reiterated the need for a permanent solution and impressed upon the Commission that neither WCC nor Adak Telephone Utility can survive absent a waiver from the Commission. The Companies reminded FCC staff that only last month, an 8.0 magnitude earthquake hit Adak Island, and WCC was the sole cellular service available on Bering Hill, where all of the approximately 300 people on the Island remained for hours while in danger of a tsunami, and while awaiting clearance from public safety personnel to return to lower ground.[2]

The Companies expressed their belief that they have demonstrated beyond doubt that the Commission should grant their pending petitions. The companies have continually reinvested in quality service for the residents of Adak Island. They have met every single requirement of the Commission's 2011 USF Transformation Order waiver standards.[3] The companies have diligently and comprehensively answered every single question asked by staff, and have addressed the concerns expressed by the Bureaus in their denial order.[4] The companies have demonstrated that WCC has taken *less* in overall Universal Service support funding than GCI for Adak Island, while at the same time has served a broader geographic area, and more customers.

AEE and WCC are tiny companies that worked tirelessly against the odds to provide quality, reliable service to remote Adak Island when no one else would.[5] The companies have embodied the very purpose of universal service by reinvesting USF support to maintain essential services – including the only broadband service, the only wireline service, and the most comprehensive wireless service – for residents, government agencies, business, and workers on Adak Island – one of the most remote areas of the United States. With interim relief set to expire in soon, the companies will be forced to begin the process of shutting down in January unless the Commission quickly corrects course. Without action, the FCC will have eliminated critical communications to this remote island.

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[2] Adak Eagle Enterprises, LLC, and Windy City Cellular, LLC, *Notice of Ex Parte*, WC Docket No. 10-90 and WT Docket No. 10-208 (filed June 24, 2013).

[3] *See In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011).

[4] Adak Eagle Enterprises, LLC and Windy City Cellular, LLC, *Petitions for Waiver of Certain High-Cost Universal Service Rules*, WC Docket No. 10-90 and WT Docket No. 10-208, Order, 28 FCC Rcd 10194 (2013). *See also* Adak Eagle Enterprises, LLC and Windy City Cellular, LLC Application for Review, *Petitions for Waiver of Certain High-Cost Universal Service Rules,* WC Docket No. 10-90 and WT Docket No. 10-208 (filed Aug. 14, 2013); Adak Eagle Enterprises, LLC and Windy City Cellular, LLC Petition for Reconsideration, *Petitions for Waiver of Certain High-Cost Universal Service Rules*, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Aug. 14, 2013); Adak Eagle Enterprises, LLC and Windy City Cellular, LLC Reply to Opposition to Petition for Reconsideration, *Petitions for Waiver of Certain High-Cost Universal Service Rules*, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Sept. 9, 2013); Adak Eagle Enterprises, LLC and Windy City Cellular, LLC Reply to Opposition to Application for Review, *Petitions for Waiver of Certain High-Cost Universal Service Rules*, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Sept. 9, 2013).

[5] *See* Attachment 1, Story of Adak Telephone Utility.

Adak Island is, by its very nature, a "high cost" area, and may well be the highest cost area in the country. Due to the extremely remote location (an island 1,200 miles southwest of Anchorage, making transportation extremely expensive as heavy supplies and equipment must be shipped in by barge), extreme climate (frequent cyclonic storms with wind gusts in excess of 100 knots, extensive fog storms in the summer, average accumulated snowfall of 100 inches – making building and maintenance extremely expensive), extreme conditions (in the vicinity of an active volcano, in an earthquake zone, in a tsunami zone), and other factors (saturated with active bombs dating back to World War II – complicating digging and trenching; infestation by large Norwegian rats that chew through cable – requiring the use of expensive armored cable; high energy costs, with electricity rates increasing by approximately 85% since 2010, and the Island's only provider of electricity now requesting an additional rate increase of over 60%), building and maintaining a working wireline, wireless, and broadband communications system, including a working public safety system, is no joke, and is not cheap. The Commission itself recognized the cost challenges associated with such an extreme climate and location by setting forth a straightforward waiver procedure.[6] The Bureaus should be applauding the companies for their ingenuity and persistence in building out a working communications system under these severe and difficult circumstances. Instead, the Bureaus have chosen a path that will destroy these Companies.

Counsel emphasized that AEE and WCC are increasingly confused as to what basis the Bureaus could have to uphold their order denying the Companies' waiver petitions at this point.[7] As discussed in previous filings, there was no actual opposition to the Companies' Petition for Reconsideration, which discussed in detail how AEE and WCC have diligently taken steps to comprehensively address the concerns raised by the Bureaus.[8] For example, the Companies have slashed corporate salaries (even though they were reasonable relative to NTCA and Alaska Department of Labor salary ranges), placing AEE's administrative building on the market for sale (even though AEE was paying below market rent for the building), cut staff by more than half, reduced employees' weekly hours, largely eliminated travel and training expenses, canceled construction of an additional cell site, and operated without expensive backhaul redundancy as a result of their reduced funding.[9]

With respect to the Application for Review, counsel emphasized that the companies are perplexed by the Bureaus' decision-making from a legal, policy, and fiscal perspective. From a legal

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[6] *See Connect America Fund, et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17633 (2011) ("*USF/ICC Transformation Order*").

[7] *Adak Eagle Enterprises, LLC and Windy City Cellular, LLC, Petitions for Waiver of Certain High-Cost Universal Service Rules*, WC Docket No. 10-90 and WT Docket No. 10-208, Order, 28 FCC Rcd 10194, ¶ 1 (2013) ("*Denial Order*").

[8] *See* Reply to Opposition to Petition for Reconsideration, AEE and WCC, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Sept. 9, 2013).

[9] *See* Petition for Reconsideration at 5-9; *see also* Adak Eagle Enterprises, LLC, and Windy City Cellular, LLC, *Notice of Ex Parte*, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Sept. 20, 2013); Adak Eagle Enterprises, LLC, and Windy City Cellular, LLC, *Notice of Ex Parte*, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Oct. 23, 2013).

perspective, AEE and WCC remain dismayed by the Bureaus' denial of their waiver petitions given that they have provided exhaustive amounts of detailed information demonstrating they satisfy the waiver standard set forth in the *USF/ICC Transformation Order*.[10] The denial is particularly inexplicable given that the Bureaus relied on the unenforceable and unsubstantiated "assurances" of GCI to provide hypothetical service at some point in the future as sufficient to qualify as a "terrestrial alternative" that is "available" under the Commission's waiver standard.[11] AEE and WCC cannot understand how the Bureaus could rely on this type of unsubstantiated "pinky promise" as a legal basis to deny their petitions under the waiver standard set forth by the Commission.

Additionally, AEE provides the only broadband service for Adak consumers, and its fiber infrastructure is critical for all communications on the island. AEE's fiber also facilitates the delivery of the island's only cable television service, which provides residents with access to the nearest "local" news programming 1,200 miles away from Anchorage.

As a policy matter, it does not make sense that the Bureaus have chosen to entrust service to the Island to GCI, which currently does not serve significant portions of the study area beyond the downtown Adak area, does not even serve the entire downtown area, does not appear to provide a working 911 system, and has never invested in the infrastructure, facilities, or equipment on the island to provide more than very limited wireless service, all while taking more money from the USF.[12] GCI cannot guarantee build-out quickly enough such that no customers would lose service, has made no enforceable promises regarding future service, and has provided no concrete plans or cost studies to back up its "assurances."

The companies are perplexed as to how the Bureaus could conclude that "the residents of and visitors to Adak Island *will continue to have access to both wireline and wireless voice service without the grant of a waiver here*."[13] This statement is flatly untrue. GCI specifically stated it does not commit to replicating AEE's wireline service,[14] even though it admits that even its (apparently non-working) 911 service is dependent on the AEE wireline infrastructure. Instead, GCI assures the Commission that it will "find a way to deliver those 911 calls to public safety" (even though it has thus far not

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[10] *See USF/ICC Transformation Order,* Section VII(G), ¶¶ 539-544.

[11] *See* Application for Review at 1-2; *see also USF/ICC Transformation Order*, ¶ 540.

[12] *See* Reply to Opposition to Application for Review at 2, 4; Application for Review at 4-6; Adak Eagle Enterprises, LLC, and Windy City Cellular, LLC, *Notice of Ex Parte*, WC Docket No. 10-90 and WT Docket No. 10-208 (filed Dec. 2, 2013).

[13] *Adak Eagle Enterprises, LLC and Windy City Cellular, LLC, Petitions for Waiver of Certain High-Cost Universal Service Rules*, WC Docket No. 10-90 and WT Docket No. 10-208, Order, 28 FCC Rcd 10194, ¶ 1 (2013) (emphasis added) ("*Denial Order*").

[14] *See* Opposition of General Communication, Inc. to AEE's and WCC's Application for Review and Petition for Reconsideration, WC Docket No. 10-90, *et al.*, at n. 8 (filed Aug. 30, 2013) ("… although GCI committed to continuing to provide voice service, it did not commit to providing 'wireline' service."); *see also* Reply to Opposition to Application for Review, AEE and WCC, WC Docket No. 10-90, *et al.*, at 1 (filed Sept. 9, 2013) ("Reply to Opposition to Application for Review").

managed to do so).[15] The Companies are hard pressed to believe that the Commission would endorse the idea that imaginary wireline service, no broadband service, and limited, unreliable wireless service are "good enough" for Adak Island. This is not consistent with the goals of USF reform, and not consistent with the Commission's promises.

Furthermore, the Bureaus did not properly consider the potential for a default on AEE's RUS loan, ignoring the Commission's direction to "consider whether the specific reforms would cause a provider to default on existing loans and/or become insolvent."[16] The Bureaus made only a passing reference to this requirement under the waiver standard in a single footnote, inexplicably concluding that "even in the event that AEE were to default on its RUS loan, this cost would be far more than offset by savings to the [Universal Service Fund]."[17] As the Companies have explained, this conclusion is not only unsupported by any cost analysis, but it also appears to be wrong.[18]

The Bureaus inexplicably seem to endorse GCI's improper and legally unsupportable statement that it can and should somehow simply be able to swoop in and "take over" the investments that AEE and WCC worked so hard and so carefully to plan and build (literally some portions by hand) over many years and at much risk. Under Section VII(G) of the *USF/ICC Transformation Order*, the Commission did not delegate authority to the Bureaus to deny a waiver based on another company's unenforceable statements that it will (for pennies on the taxpayer-funded dollar) "by hook or by crook" just somehow seize another unrelated company's assets, or that it will build and offer additional services at some hypothetical point in the future to customers in areas where it has never provided service and has never previously bothered to make the investments necessary to do so.[19] Moreover, simply allowing GCI to "take over" AEE and WCC's hard-earned investments in this way would be entirely inconsistent with the Commission's commitment to encouraging investment, particularly in rural areas.

None of this makes any sense from a legal, policy, or fiscal perspective. The lengthy, costly, and overly burdensome waiver process has been a travesty on many levels. The Commission repeatedly promised "no flash cuts," yet WCC was hit with an immediate 84% flash cut in funding while AEE was hit with a rapid phase-down in funding.[20] The Commission promised a "90 day" waiver process that took 468 days to reach a final decision. AEE and WCC dutifully and diligently prepared and filed their waiver petitions, and met every single factor set forth in the Commission's

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[15] *See* CGI, *Notice of Ex Parte* at 2, WC Docket No. 10-90, *et al.* (filed Nov. 27, 2013) ("GCI Nov. 27 Ex Parte").

[16] *USF/ICC Transformation Order*, ¶ 540.

[17] *Denial Order* at n.72.

[18] Reply to Opposition to Application for Review at 3.

[19] *See* Application for Review at 6.

[20] *See, e.g.,* Letter from Monica Desai, Counsel, AEE and WCC, to Marlene H. Dortch, Secretary, FCC, Notice of Ex Parte, at 3-4 (filed May 14, 2013) (for example, Commissioner Clyburn stated: "Importantly, our reform carefully balances the need for certainty and predictability for carriers by avoiding flash cuts and providing transitions so they can adjust to the changes.").

waiver standard. The companies quickly and comprehensively responded to multiple rounds of questions from the Bureaus that went beyond the waiver standard.

AEE and WCC are hopeful that the Bureaus will promptly correct course before their interim relief expires and the companies are forced into bankruptcy. The companies are ready and willing, and in fact eager, to respond to any questions and concerns that staff may have regarding their requests for funding. The promise of universal service requires that the remote Adak community be able to continue relying on the essential wireline, wireless, and broadband services provided by AEE and WCC.

Respectfully submitted,

Monica S. Desai
Squire Patton Boggs, LLP
2550 M Street, NW
Washington, DC 20037
202-457-7535
Counsel to Adak Eagle Enterprises, LLC and Windy City Cellular, LLC

cc:

Philip Verveer
Daniel Alvarez
Amy Bender
Nicholas Degani
Rebekah Goodheart
Priscilla Argeris
Carol Mattey
Michael Janson
Roger Sherman
Suzanne Yelen

ATTACHMENT 1

ADAK TELEPHONE UTILITY STORY

As told by Larry Mayes, Founder, President and CEO

Adak Island is part of the Aleutian Chain of islands located 1,300 miles southwest of Anchorage Alaska in the Bering Sea. It is the most southern community in Alaska. Adak lies in the subpolar oceanic climate zone, characterized by persistently overcast skies, high winds, and frequent cyclonic storms. Winter squalls produce wind gusts in excess of 100 knots (120 mph; 190 km/h). During the summer, extensive fog forms over the Bering Sea and the North Pacific. Average temperatures range from 20 to 60 °F (-7 to 16 °C), but wind chill factors can be severe. Total precipitation is 64 inches (1,600 mm) annually, with an average accumulated snowfall of 100 inches (2,500 mm). With 263 rainy days per year, Adak has the second highest rainy day number of any inhabited locality in the United States after the city of Hilo in Hawaii.

Adak Island was the home of over 6,000 Navy personnel before it was selected for closure in 1996. The Aleut Corporation (TAC), which is an Alaska Native corporation, traded other land they owned with the government to get Adak Island and the transfer took place March 17, 2004. The idea of TAC was to rebuild the community that was once a military base into a fishing community. I had just retired from the US Military (Army) in December 1996 and in February 1997 was contacted by a representative of one of TAC's subsidiary companies to work on Adak Island as a Telecommunications Technician. This contract was to maintain the following telecommunication systems: telephone, pager, VHF/UHF radio, cable TV, and computer. I worked with six other telecommunications personnel to maintain the telecommunication systems on Adak. As the land transfer was just about to become a reality, the other personnel started looking for other employment because the Navy support funding of the land transfer was coming to an end. I was the only one left there to take care of the telecommunications systems on Adak.

The reason I stayed was because of my belief in what TAC wanted to do with the old Navy military base. Adak Reuse Corporation (ARC), which was one of the TAC subsidiary companies that took over the operation of Adak, planned to turn the Navy Base into a community once the Navy presence was gone. Adak could be used by the fishing industry as a refueling location and fish processing plant, and by the airlines as an emergency landing location with 7,600 and 7,800 foot runways.

The telephone system (Central Office and Outside Plant) that the Navy had left in place was antiquated and needed replacement badly. Because I was the only technician on Adak, I was regularly called back to the island to fix problems. I would fly out of Adak to visit my family for two weeks but often had to return on the next flight to Adak because of problems with the telephone switch and outside plant. I was always on the phone with Digital Voice Company (the switch manufacturer) to fix problems and get the system back up and running correctly. The Digital Voice switch was a military PBX equivalent without the required features of a civilian switch. A temporary switch was leased from Digital Voice when the older switch could not function further. Amazingly, the switch manufacturer was able to supply the replacement switch and we were able to install it within a two month period. It was a simple switch that functioned but did not have all the nuances of the modern switches.

The outside plant's twisted pair copper wiring was a huge mess. I had to put my tone on a pair of wires at one demarcation point and go from that demarcation point to another one to find a good pair that would go back to the switch to be used for telephone service. I would do this until a good pair was found. I was only one person to maintain those communications systems while working alone and no matter what the weather was like or what was needed to do to complete the installation or fix a situation, I did it as well as I could.

What you find normal in the lower 48 to fix a circuit and install new service is not what you will find in a remote rural area like Adak. Adak is infested with rodents (Norwegian Rat) that we regularly encountered when we needed to crawl under customer houses or in a building crawl space to install or fix a cable.

The weather is not your friend on Adak, and it is not consistent. The island has a saying: "If you don't like the weather, just wait five minutes and it will change." So when you have good weather, you better use it to your advantage. When the grass is wet and the sun is shining, that creates a lot of small flying bugs that get into your eyes and mouth when you are trying to work.

TAC and ARC approached two or three other Alaskan telephone providers to take over the telephone system because neither TAC nor ARC was capable of running a telephone company, and they wanted to create other businesses on Adak Island besides TAC companies. Two of the companies visited Adak to assess the system, and I gave them tours and provided them with maps of the entire system. While both companies were significantly experienced in rural operations, both telecommunications companies declined to serve Adak Island as a telephone company.

After TAC or ARC could not get a telephone company that was already in business to serve Adak Island, they approached me and asked if I would like to run the telephone system on Adak Island. I agreed to take over the telephone system on Adak Island since I had been working the system for many years alone and knew the system intimately.

Once I had the telephone system, I set up an office in my home and I had my family help with invoices and paperwork. Before long, I needed someone to help with accounting so I hired Mrs. Andilea Weaver to do the accounting. We both were new to this regulated industry. I informed Mrs. Weaver that we were just starting out and we had a very small customer base. Also, I informed her there was going to be a lot of work and that I could only pay her when I could – and that was not regularly. I used my retirement funds, family savings, small loans from banks, and maxed out my credit cards to get started.

I worked all day and spent many hours at night into the next morning trying to draft the application for the certificate of public convenience and necessity (CPCN) to provide local exchange service in Alaska for Adak Eagle Enterprises, LLC (AEE) d/b/a Adak telephone Utility (ATU). The Regulatory Commission of Alaska (RCA) staff knew me pretty well because I had called and visited their office many times to learn how to fill out the application. Once I thought I had completed the application for CPCN, I turned the application into the RCA for review. After the RCA had reviewed the CPCN application, the staff recommended that I hire a consultant to help out with the CPCN application.

In 2000, ARC had hired Kenneth Trout (KET, Inc.) to submit an application to RCA for a new certificate of public convenience for the Adak Study area. Since it had been a government base, the Navy didn't have a certificate from RCA. RCA issued ARC a Temporary Operation Certificate. I contacted KET, Inc. and asked Kenneth if he would help with the drafting and filing of the CPCN application for AEE. Kenneth came in and helped with the application and then he recommended Dean Thomson, a lawyer with the law firm of Kemppel, Huffman & Ellis, P.C., who is experienced with filing and regulatory issues.

There was much work to be done, and there were limited funds to this, but both firms came to fulfill our need to set up a telephone company. While we were going through this procedure, they suggested that we apply for a Rural Utility Service (RUS) loan to rebuild the telephone system infrastructure on Adak. RUS was contacted, and we were put in touch with Doug Devore and Mike Riley of Mid-State Consultants, who helped to prepare the documentation to apply for an RUS loan. Wes Lannen, our field representative from RUS, also assisted us in completing the RUS loan application. Reeve Engineering had taken pictures of the facilities and completed an on-site review, and had determined that the entire plant should be replaced.

Jim Rowe and the Alaska Telephone Association (ATA) members were great mentors in letting ATU join the association and taking a young inexperienced company under their wing.

In 2005, while talking with Doug Devore about needing some help on Adak, he stated that he might know of a technician who would be willing to work on Adak. So Doug had Michael Eickoff call me and we worked out a deal for him to work on Adak with me.

We submitted a loan package to RUS for over six (6) million dollars to replace the entire telephone system on Adak. RUS based the approval contingent upon the FCC'S granting of waivers into the National Exchange Carrier Association, Inc. (NECA pools) and inclusion in the Universal Service Administrative Pools (USF). (*See* Schedule I of RUS loan.) After the FCC orders granting those items, the processing of the loan continued and RUS approved our loan package request for over 6 million dollars. With these funds RUS funds, AEE was able to rebuild the communication system with modern technology (Class 5 Switch, FTTH, DSL, and ONT). The first draw was finally available in July 2006. Without RUS approving the AEE loan request, the Adak community would still be having problems with the old military switch, and corroded twisted pair outside plant wiring.

RUS, RCA, FCC, consulting firms, lawyers, ATA and their members have been a blessing to a small community like Adak.

Building the system and coordinating logistics was a challenge because of the need to coordinate materials and equipment arriving from the lower 48 states into Alaska, and then having to further coordinate shipping to Adak on a Navy barge that assisted in the initial process. There were no direct barges from the lower 48 to Adak. Bad weather occasionally kept the contractors and equipment from arriving on time. Airline scheduling had to be worked out and efforts had to be made to get a reliable schedule in place. Scheduling an airline that would be willing to go all the way to Adak was a significant task. Currently, airline travel is only possible on Thursdays and Sundays from Anchorage to Adak, with the help of Alaska Airlines.

Construction included such challenging tasks as obtaining local sand and gravel for repairs of road crossings and obtaining and using equipment for washing the sand and gravel so that it would perform properly in the concrete. Due to the remoteness of Adak Island, a ready source of these items could not be called upon to truck material to the sites.

Building the fiber optic network included waiting for the manufacturer to build file jumpers, making sure hazmat regulations were followed while shipping batteries, and coordinating construction crews' arrival along with the housing needed to accommodate them.

Ongoing power supply and infrastructure has been a significant issue while the TAC and the Adak city government worked to have reliable power. At one point, the residents were cautioned to leave the island due to the prospects of possible power shutdowns. Meanwhile, Adak Tel brought in a generator to supply power for phones and the company used this in their central office.

Today, with the USF support provided, and because of RUS loans, the telecommunications on the island provided by AEE include facilities for wireline, which includes voice, broadband, and television, as well as wireless. This system provides significant parts of the infrastructure needed for the community to survive and for the economy to grow, consistent with the vision of The Aleut Corporation.