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Arctic Slope Telephone Association Cooperative, Inc.

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August 27, 2014

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

RE: **Ex parte filing** in WC Docket Nos. 10-90 and 05-337

Dear Ms. Dortch:

On August 27, 2014, Christine O'Connor, Executive Director for the Alaska Telephone Association, Jens Laipeniaks and Clover McNeil from ASTAC, Andrea Sanders, Legislative Assistant and Rafi Bortnick, legislative Correspondent for Senator Begich, Jason Suslavich, Legislative Assistant for Congressman Young met with FCC Chairman Wheeler and Patrick Halley, his Legal Advisor. Steve Merriam, CEO/GM for ASTAC and Jeff Smith, President and CEO of GVNW participated telephonically.

The briefing portion of our meeting was spent describing a.) the current middle mile connectivity challenges facing the North Slope Borough, an arctic land mass larger than 40 of the states in the United States and providing information on a privately funded, undersea fiber project (<http://arcticfibre.com>) that is being constructed in 2014 - 2016 and which plans to bring fiber optic landings to the North Slope and Northwest Arctic Boroughs and the Seward Peninsula of Alaska.

We finished our meeting voicing concern that the Arctic Fibre/Quintillion timeline for completion and activation of the undersea fiber necessitates a corresponding timeline investment in ASTAC infrastructure to leverage the 100Gbps capacity per landing. This will all likely occur before there is a successor model developed to replace Quantile Regression Analysis (QRA) model.

Our prior experience with trying to correct obvious errors for ASTAC in the QRA model were glacially slow at the Bureau level; the non-responsiveness to the factual data we presented was perplexing. Given the substantial upgrade required in last mile facilities and the corresponding significant debt obligation we will incur in doing so, we cannot afford a similar experience with a future follow on model. In our instance, there could be a real world consequence to rural Alaska Natives *and* a missed opportunity to reduce dependence on USF if a future model precludes recovery of costs incurred to fully take advantage of the once in a generation opportunity represented by the Arctic Fibre project.

We also relayed that the Alaska Delegation is highly supportive of this project and will assist by all means available to make sure that high cost support to build and operate last mile facilities in remote rural Alaska is sufficient for sustainability.

As required by the Commission's rules, this ex parte record is now filed in the above referenced dockets. If there are any questions, please call me at 907-563-3989.

Respectfully submitted,

/s/

Steve Merriam, CEO  
Arctic Slope Telephone Association Cooperative, Inc.

Copy to:

Chairman Wheeler  
Patrick Halley  
Christine O'Connor  
Jens Laipenieks  
Clover McNeil  
Andrea Sanders  
Rafi Bortnick  
Jason Suslavich  
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Dave Dengel

Attachment: FCC Briefing Slides 082714