



Arctic Slope Telephone Association Cooperative, Inc.
4300 B Street, Suite 501, Anchorage, AK 99503
907-563-3989 • 1-800-478-6409 • f: 907-563-1932

April 14, 2015

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 No. 10-90

Dear Ms. Dortch:

On April 14, Clover McNeil from Arctic Slope Telephone Association Cooperative (ASTAC) and the undersigned as well as Jeff Smith from GVNW Consulting, Inc. (by teleconference) conducted an ex parte meeting with Rebekah Goodheart from Commissioner Clyburn's office.

We discussed several key points from the March 19, 2015 letter from NTCA CEO Shirley Bloomfield to Chairman Wheeler that detailed the overwhelming rural industry consensus on the need for rural support mechanisms to be updated for the broadband platform in the very near term to the baseline proposal from NTCA, WTA, ERTA, and NECA that would achieve long overdue equity in the support sphere for carriers whose customers order only a data connection.

We discussed the impracticality of establishing a federally tariffed rate for backup power, as addressed on pages 12-14 of the GVNW comments that were filed on February 5, 2015 in the Tech Transition docket (GN Docket No. 13-5).

We also reviewed the steps that ASTAC is engaged in to increase available broadband and bring advanced wireless service to their customers and reviewed the need to recognize the special circumstances that create higher than average costs for carriers such as ASTAC and the entire subset¹ of rural carriers serving high cost territory.

¹ For carriers in Alaska that provide service to one of the most resource-rich areas of our country that helps fuel the national economy, this service is provided in an environment that in many places lacks a road system, commercial power and is impacted by extreme geographical and climactic challenge. The recent closing of the only overland supply route (Dalton Highway) to the Prudhoe Bay oilfields by water overflow and ice from the Sag River highlights the extraordinary difficulty serving the remote arctic. See : <https://www.adn.com/article/20150408/dalton-highway-ice-sheet-alaska-gov-walker-declares-disaster>



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Finally, we discussed how the Lifeline program might be modified to support a broadband only service.

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 907-564-2600.

Respectfully submitted,

Via ECFS 4/14/15

Steve Merriam
CEO

Copy to
Rebekah Goodheart, FCC
Clover McNeil, ASTAC
Jeff Smith, GVNW
Christine O'Connor, ATA Executive Director