

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)
	)
Connect America Fund – Alaska Plan	) WC Docket No. 16-271
	)
Alaska Telecom Association Petition for Expedited Rulemaking	) RM-11942
	)

**COMMENTS  
OF  
WTA – ADVOCATES FOR RURAL BROADBAND**

WTA – Advocates for Rural Broadband (“WTA”) hereby supports the petition for expedited rulemaking that was filed by the Alaska Telecom Association (“ATA”) on January 4, 2023, and that appeared on Public Notice in Report No. 3190 on January 24, 2023.

As the Commission is well aware, the state of Alaska is subject to unique geographic, topographic, climate and demographic conditions that make it extremely difficult and expensive to provide quality and affordable broadband service. These challenges include long and harsh winters with plenty of ice and snow; a mountainous and forested terrain that contains few roads and forces reliance instead upon small planes, boats and off-road vehicles for a large portion of travel; a very short construction season and irregular maintenance windows; and a multiplicity of scattered small towns and villages with few substantial population centers. Due to these and other unique conditions and circumstances, the Commission has reasonably and properly determined that it is far more effective and efficient to develop and implement specific universal service mechanisms for Alaska.

As ATA indicates, the initial ten-year Alaska Plan adopted in 2016 has provided secure and reliable funding for fifteen (15) Alaskan rate-of-return carriers and eight (8) of their mobile wireless affiliates. To date, the Alaska Plan has been successful in extending, upgrading and

providing fixed broadband service to more locations than initially proposed, often at higher speeds than initially projected, while mobile wireless service improvements have also been substantial. ATA Petition, pp. 5-8.

The Alaska Plan is scheduled to remain in effect until December 31, 2026. However, given the substantial and ongoing increases in customer demand for higher broadband speeds, the pending proposals for modification and extension of the existing Lower 48 high-cost support mechanisms to better meet growing broadband service demands, and the pending plans for distribution of federal and state grants for the construction of last mile and middle mile extensions and upgrades, the Commission should reassess Alaskan universal service support needs at this time.

ATA's proposals for updating and extending the current Alaska Plan are eminently reasonable. The revised Alaska Plan would commence as soon as possible during the current Alaska Plan term that ends December 31, 2026, and would continue until December 31, 2034. It would adjust the current frozen support levels for incumbent rate-of-return carrier participants (2011 support based on 2009 costs) and for current mobile service participants (2014 support set in 2011) to reflect the substantial inflation that has occurred since those time and to address continuing future inflation. It would update through 2034 the individual company performance plans that are negotiated by the Commission with individual Alaska Plan participants. Finally, it would allow Alaska Communications (which receives frozen CAF Phase II support) and current Alternative Connect America Cost Model ("ACAM") support recipients to opt into the revised Alaska Plan with the goal of consolidating all Alaskan high-cost support into a single uniform mechanism for the state.

WTA reiterates that ATA's proposals for revised Alaska Plan support are wholly reasonable and necessary to continue progress in providing reasonably comparable and affordable broadband service in some of the nation's most difficult and expensive environments. It will put Alaska carriers on a timetable similar to those of other high-cost support recipients, provide an urgently needed inflationary adjustment for antiquated 2011 and 2014 support levels, permit the updating of the negotiated individual company performance plans that have proven to be very effective, and encourage the establishment of a single, uniform Alaskan high-cost support mechanism. WTA urges the Commission to issue a Notice of Proposed Rulemaking for the proposed revised Alaska Plan as soon as possible.

Respectfully submitted,  
**WTA – ADVOCATES FOR RURAL BROADBAND**

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Dated: February 22, 2023