



Advocates for Rural Broadband

Jimmy Todd
President

Kelly Worthington
Executive Vice President

August 11, 2023

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

**RE: Connect America Fund; Connect America Fund – Alaska Plan
WC Docket Nos. 10-90 and 16-271**

Dear Ms. Dortch:

WTA – Advocates for Rural Broadband (“WTA”) reiterates its support for the Petition for Expedited Rulemaking filed by the Alaska Telecom Association (“ATA”) on January 4, 2023.

The Commission is well aware that the State of Alaska is subject to unique geographic, topographic, climate and demographic conditions as well as middle mile transport availability and costs that make it extremely difficult and expensive to provide quality and affordable broadband service and that make it far more effective and efficient to develop and implement specific universal service mechanisms for Alaska.

The initial ten-year Alaska Plan adopted in 2016 has provided secure and reliable funding that has enabled 15 Alaskan rate-of-return carriers to extend, upgrade and provide fixed broadband service to more locations than initially proposed (often at higher speeds than initially projected) and 8 mobile wireless affiliates to make substantial improvements.

ATA’s proposals for updating and extending the current Alaska Plan should be adopted as eminently reasonable and in the public interest. The revised Alaska Plan would best provide the stability and predictability needed to continue ongoing deployment progress if it commences on January 1, 2024, or as soon as possible thereafter. It is needed to 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 general inflation that has occurred and continues to occur since those times and that exacerbates the already extremely high costs of broadband equipment, construction and maintenance in Alaska. The revised Alaska Plan would also update the individual company performance plans that are negotiated by the Commission with participants, and allow all Alaskan high-cost support recipients to opt into a single uniform mechanism for the state.

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WTA urges the Commission to move forward expeditiously to consider and adopt an updated and extended Alaska Plan that can go into effect as of January 1, 2024, or very soon thereafter in order that Alaskan rural broadband deployment can keep on a pace that is reasonably comparable with that in the Lower 48.

Respectfully submitted,
WTA – ADVOCATES FOR RURAL BROADBAND

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