PUBLIC NOTICE

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WIRELINE COMPETITION BUREAU ANNOUNCES PERFORMANCE OBLIGATIONS FOR RATE-OF-RETURN ALASKA PLAN RECIPIENTS AFTER THE MIDTERM REVIEW

WC Docket No. 10-90
WC Docket No. 16-271

On August 23, 2016, the Federal Communications Commission (Commission) adopted the *Alaska Plan Order*.[1] In the *Alaska Plan Order*, the Commission provided a one-time opportunity for Alaskan rate-of-return carriers to elect to receive support frozen at adjusted 2011 levels for a 10-year term from 2016 until 2026 in exchange for meeting individualized performance obligations—offering voice and broadband services meeting specific service obligations at specified minimum speeds by five-year and 10-year service milestones to a specified number of locations.

The Commission also directed the Wireline Competition Bureau (Bureau) "to reassess the deployment obligations in the approved performance plans before the end of the fifth year of support," that is, 2021, and required that "participating carriers update their end-of-term commitments no later than the end of the fourth year of support."[2] The Commission further delegated to "the Bureau the authority to review and approve modifications that serve the public interest."[3]

After reviewing the participants' end-of-term commitments, annual location filings, and middle-mile map submissions, the Bureau approves the performance obligations in Appendix A. Appendix B to this public notice provides the minimum number of locations to be reported in the High-Cost Universal Broadband portal, or HUBB, i.e., newly deployed and upgraded locations over the term of the Alaska Plan,[4] by speed and middle-mile at the five-year and 10-year service milestones.

For purposes of administrative convenience to allow the Universal Service Administrative Company (USAC) sufficient time to make modifications to the HUBB to account for revised commitments at speed tiers not yet available to report,[5] on our own motion we waive the March 1, 2022 deadline for annual location reporting for rate-of-return Alaska Plan participants Adak Telephone Utility

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[1] *Connect America Fund, et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139 (2016) (*Alaska Plan Order*).

[2] *Id*. at 10158, para. 61

[3] *Id.* Carriers with approved plans to maintain existing levels service are subject to biennial review. *See Alaska Plan Order*, 31 FCC Rcd at 10158, para. 62. This midterm review also encompasses the Bureau's biennial review.

[4] 47 CFR § 54.316(a)(5).

[5] *See* Universal Service Administrative Company, High Cost Universal Broadband (HUBB) Data Formatting Instructions, https://www.usac.org/wp-content/uploads/high-cost/documents/Tools/HUBBDataFormatting.pdf, at 16-17 (Revised April 2021) (not available to report 2/1 (satellite), 25/5 (microwave/fiber), 25/5 (fiber), or 100/20 (fiber)).

(Adak) (SAC 610989), Arctic Slope Telephone Cooperative (ASTAC) (SAC 613001), and Matanuska Telephone Association (MTA) (SAC 613015).[6] Once USAC has made the needed modifications to the HUBB so that it can collect the information, the Bureau will announce a new deadline. These three rate-of-return Alaska Plan participants are still required to certify compliance with their respective five-year milestones by March 1, 2022[7] and file updated middle-mile maps also by March 1, 2022.[8]

For additional information on this proceeding, contact Jesse Jachman, jesse.jachman@fcc.gov of the Wireline Competition Bureau, (202) 418-2668.

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[6] 47 CFR § 54.316(c). *See also* 47 CFR § 1.3 *and Connect America Fund; ETC Annual Reports and Certification*s, WC Docket Nos. 10-90, 14-58, 35 FCC Rcd 6543 (WCB 2020) (extending a filing deadline to allow USAC time to make updates to an online filing system). For performance measures testing, the Bureau and USAC will develop a timeline for Adak, ASTAC, and MTA to test at these new speeds, 2/1 Mbps, 25/5 Mbps, and 100/20 Mbps, as the speed tiers become available in the Performance Measures Module (PMM). In the meantime, ASTAC and MTA shall continue testing their existing samples at the previously committed speed tiers, 10/1 Mbps and 100/5 Mbps respectively. With Adak now having committed to new deployment, it will start performance measures testing for the first time at the 2/1 Mbps speed tier. *See Connect America Fund*, WC Docket No. 10-90, Order on Reconsideration, 34 FCC Rcd 10109, 10143-44, paras. 93-94 (2019).

[7] *See* 47 CFR § 54.316(b)(6).

[8] *See* 47 CFR § 54.316(a)(6), (c)(1).

APPENDIX A

RATE-OF-RETURN ALASKA PLAN CARRIERS PERFORMANCE OBLIGATIONS

Adak Telephone Utility[1]

	Note 1		Note 2	Note 3	Note 4	
Middle Mile Facility	Speed to End User	Data Minimum GB	Base Locations Passed 12/31/2015	% At or Above Benchmark 12/31/2015	% At or Above Benchmark Year 5	% At or Above Benchmark Year 10
Satellite	1Mb/256k		346	100%	100%	100%
Satellite	2Mb/1Mb	50	346		100%	100%
Satellite	4Mb/1Mb					

Note 1: Residential Speeds
Note 2: Locations passed in ILEC's network as of 12/31/2015
Note 3: Year 1 is 2017
Note 4: Adak Telephone Utility's is At and Above Benchmark

Narrative: Forward looking cost to maintain the plant and to continue to seek better backhaul options as customers come online.
As is, the current funding limits our ability to allow a better level of performance.
Our long term goal is to meet the ACAM requirements and secure additional funding to allow urban benchmark speed.
Adak Telephone Utility requested ACAM and was placed in the AK Plan

Arctic Slope Telephone Cooperative[2]

	Note 1	Note 2					Note 3		Note 3
Middle Mile Facility	Speed to End User	Locations Passed 1/1/15	Locations Passed 1/1/18	Number of Locations At Benchmark 1/1/18	Percent of Locations At Benchmark 1/1/18	Number of Locations At Benchmark Year 5	Percent of Locations At Benchmark Year 5	Number of Locations At Benchmark Year 10	Percent of Locations At Benchmark Year 10
Satellite	1Mb/384k	2,509	398	398	100%	398	100%	398	100%
Hybrid Microwave-Fiber	4Mb/1Mb	206							
Hybrid Microwave-Fiber**	10Mb/1Mb		161	161	100%				
Hybrid Microwave-Fiber***	25Mb/5Mb					161	100%	161	100%
Fiber**	10Mb/1Mb		2,156	2,156	100%				
Fiber***	25Mb/5Mb					2,156	100%	2,156	100%
Total		2,715	2,715	2,715		2,715		2,715	

Note 1: Residential speeds. (Intial Filing Note) In Fiber and Hybrid fed markets, ASTAC offers a 10/1Mbps best effort service with a $24.99/Mo access fee and metered usage ($2 per GB used up to 100 GB, $1 per GB after 101 GB and up). In the Satellite fed markets, ASTAC offers best effort speeds up to 1Mbps/384kbps service, including unlimited usage. ASTAC will update the Commission when our product offerings improve, triggered by improved economics** on the middle mile service.

Note 2: Residential and estimated business locations passed in ETC's network as of 12/31/15.
Note 3: Year 1 is 2017
** ASTAC's last mile (FTTH) network is capable of delivering higher broadband speeds in all markets than what is offered, but is limited by middle mile network cost/capacity constraints. ASTAC is able to meet the latency requirements in those markets connected by Fiber and Hybrid Microwave-Fiber middle mile. ASTAC has demonstrated why the reasonably comparable rate requirement and delivered speed metrics are not feasible in any of its markets with use of a simple economic model. We can show that the prohibitive factor continues to be the high cost of middle mile transport.

*** ASTAC was able to renegotiate a lower rate on middle mile capacity (Asymetric) which enabled a new 25/5 Mbps service launch in January, 2021. Upload speeds were also improved in all fiber-fed markets.

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[1] *See* Letter from Andila Weaver, Vice President, Adak Telephone Utility, LLC, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Jan. 8, 2021); Letter from Andila Weaver, Vice President, Adak Telephone Utility, LLC, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Jan. 21, 2021).

[2] *See* Letter from Jeffry H. Smith VP of Public Policy and Advocacy, Vantage Point, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 22, 2020) (Arctic Slope Telephone Cooperative); Letter from Jeffry H. Smith VP of Public Policy and Advocacy, Vantage Point, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Sept. 27, 2021) (Arctic Slope Telephone Cooperative).

Bristol Bay Telephone Cooperative[3]

Middle Mile Facility	Speed to End User (Note 1)	Locations Passed 12/31/2015 (Note 2)	Percentage of Locations At Benchmark 12/31/2015	Number of Locations At Benchmark Year 5	Projected Number of Locations Passed at Year 10	Percentage of Locations At Benchmark Speeds Year 10
Satellite	1Mb / 256k					
Microwave	4Mb/1Mb	997	99%	987		
Microwave	10Mb / 1Mb					
Fiber	10Mb / 1Mb				1037	99%
Fiber	25Mb / 3Mb				10	90%

Note 1: Residential speeds
Note 2: Locations passed in ILEC's network as of 12/31/2015

Bristol Bay Telephone Cooperative's last mile network can deliver higher broadband speeds but has been limited by the middle mile network. BBTC is currently constructing a new middle mile 11GHz microwave system to replace the inadequate 6GHz microwave system that has an estimated turnup date of March 2022. This system when complete will improve data cap restrictions as well as speeds to our broad band customers. BBTC is currently pursuing year 2021/2022 funding opportunities through USDA Reconnect Program "and other programs" to replace 11GHz microwave middle mile with Fiber Optic Facilities that will again increase both speed and capacity.

Bush-Tell Inc.[4]

Middle Mile Facility	Speed to End User (Note 1)	Locations Passed 12/31/2015 (Note 2)	Locations At Benchmark 12/31/2015	Locations At Benchmark Year 5	Locations At Benchmark Year 10
Satellite	1Mb/256k				
Microwave	6Mb/1Mb	1,109	83%	83%	83%
Fiber	10Mb/1Mb				
Fiber	25Mb/3Mb				

Note 1: Residential speeds.
Note 2: Locations passed in ILEC's network as of 12/31/2015.
Note 3: Year 1 is 2017

Bush-Tell Inc's last mile network is capable of delivering higher broadband speeds but is limited by the middle mile network. We will continue to upgrade our last mile network with fiber deployment and are prepared to offer higher speeds to end users when middle mile availability permits.

Bush-Tell will start deploying fiber farther into the network to decrease loop lengths. Bush-Tell's largest community will be deployed first which will take approximately 5 years to complete. Once this build-out is completed we will start deploying fiber throughout the rest of our service area. This fiber build-out will allow Bush-Tell to easily deploy fiber to the premise in the future and will also place Bush-Tell in a position to provide faster broadband offerings as middle mile rates and availability improve.

Villages within Bush-Tell's Study Area are between 71 and 185 miles from the nearest Middle Mile Facilities (Aniak - 92, Anvik - 130, Crooked Creek - 120, Grayling - 156, Holy Cross - 117, Kalskag - 71, Red Devil - 162, Shageluk - 149, Sleetmute - 165 and Stony River - 185). The cost to reach and utilize these facilities is so cost prohibitive Bush-Tell is currently reselling the services of the utility that owns the middle mile in question. Without this arrangement Bush-Tell would not be deploying broadband in any of our exchanges. Rates are assumed to be $328.99 and include 100GB of usage allowance as of November 21, 2016. Rates are expected to increase a minimal amount once 150GB usage allowance is offered. When cost and/or capacity of middle mile changes, rates and usage allowances will be re-evaluated and adjusted as appropriate.

Bush-Tell will continue to investigate alternative options to access middle mile as they become available.

[3] *See* Letter from Earl Hubb, Bristol Bay Telephone Cooperative, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 10, 2021).

[4] *See* Letter from Roy Wrazen, General Manager, Bush-Tell, Inc., to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Jan.11, 2021); Letter from Christine O'Connor, Executive Director, Alaska Telephone Association, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271, at 2 (Nov. 22, 2016).

Circle Utilities[5]

Middle Mile Facility	Speed to End User (Note 1)	Locations Passed 12/31/2015 (Note 2)	Locations At Benchmark 12/31/2015	Locations At Benchmark Year 5	Locations At Benchmark Year 10
Satellite	1Mb/256k	40	0%	0%	0%
Hybrid Microwave-Fiber	4Mb/1Mb				
Fiber	10Mb/1Mb				
Fiber	25Mb/3Mb				

Note 1: Residential speeds.
Note 2: Locations passed in ILEC's network as of 12/31/2015.
Note 3: Year 1 is 2017.

Circle Telephone & Electric, LLC's wire center does not have the facilities in place to provide broadband services. CTE has no terrestrial backhaul. The nearest terrestrial backhaul is located 155 miles away. The cost of satellite backhaul is too great for the small community to bear. CTE does not plan to to develop or purchase middle mile transport or to deploy broadband until the cost of those facilities changes significantly.

Copper Valley Telephone[6]

Carrier	Study Area Code	Backhaul	Speed	Base Locations	% At or Above Benchmark 01/01/17	% At or Above Benchmark Year 5 12/31/21	% At or Above Benchmark Year 10 12/31/26
Copper Valley Tel	6130006	Satellite	1Mb/256k	-	-	-	-
		Hybrid Microwave/Fiber	4Mb/1Mb	166	0%	0%	0%
		Hybrid Microwave/Fiber	10Mb/1Mb	166	58%	0%	0%
		*Hybrid Microwave/Fiber	25Mb/3Mb	166	40%	31%	31%
		Fiber	10Mb/1Mb	3,931	91%	0%	0%
		Fiber	25Mb/3Mb	3,931	-	3.51%	3.51%
		Fiber	50Mb/5Mb	3,931	-	7.07%	7.07%
		Fiber	100Mb/5Mb	3,931	-	0%	0%
		Fiber	1000Mb/100Mb	3,931	-	71.94%	89.42%

*Microwave/Fiber hybrid numbers decreased due to a fiber project that was not anticipated at the time initial Alaska Plan obligations were being prepared. By 2026, locations in the Paxson area that had originally been included with the microwave/fiber hybrid technology will be on fiber.

[5] *See* Letter from Shawn DeVore, Vice President, Circle Telephone & Electric, LLC, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Jan. 5, 2021); Letter from Shawn DeVore, Member Owner, Circle Telephone & Electric, LLC, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Mar. 30, 2021); Letter from Christine O'Connor, Executive Director, Alaska Telephone Association, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271, at 9 (May 9, 2016) (ATA May 9, 2016 *Ex Parte*).

[6] *See* Letter from Jeffry H. Smith VP of Public Policy and Advocacy, Vantage Point, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 21, 2020) (Copper Valley Telephone); Letter from Jeffry H. Smith VP of Public Policy and Advocacy, Vantage Point, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Aug. 5, 2020) (Copper Valley Telephone); Letter from Jeffry H. Smith VP of Public Policy and Advocacy, Vantage Point, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Sept. 27, 2021) (Copper Valley Telephone).

Cordova Telephone Cooperative[7]

Middle Mile Facility	Speed to End User (Note 1)	Base Locations 12/31/15 (Note 2)	% At Or Above Benchmark 12/31/15	# At Or above Benchmark 12/31/15	% At Or Above Benchmark Year 5	# At Or Above Benchmark Year 5	% At Or Above Benchmark Year 10	# At Or Above Benchmark Year 10
Satellite	1Mb/256k							
Hybrid Microwave-Fiber	4Mb/1Mb							
Fiber	10Mb/1Mb	850	100%	850	100%	850	100%	850
Fiber	25Mb/3Mb	850	98%	833	100%	850	100%	850
Fiber	50Mb/5Mb	850	50%	425	80%	680	100%	850
Fiber	100Mb/5Mb	850	0%	-	50%	425	100%	850

Note 1: Residential speeds.
Note 2: Locations passed in ETC's network as of 12/31/15.
Note 3: Year 1 is 2017.

Interior Telephone Company[8]

Middle Mile Facility	Speed to End User (Note 1)	Base Locations 12/31/2015 (Note 2)	Locations At Benchmark 12/31/15	Number of Locations Passed 12/31/2017	Percent of Locations At Benchmark Year 5 (Note 3)	Number of Locations at Benchmark Year 5	Percent of Locations At Benchmark Year 10	Number of Locations at Benchmark Year 10
Satellite	1Mb/256k	2,518	95.00%	2,392	95.00%	2,392	95.00%	2,392
Hybrid Microwave-Fiber	4Mb/1Mb							
Fiber	10Mb/1Mb	3,051	0.00%	0	4.06%	124	4.06%	124
Fiber	25Mb/3Mb		0.00%	0	95.87%	2,925	95.87%	2,925

Note 1: Residential speeds.
Note 2: Base Locations in ETC's network as of 12/31/15. Source is 2010 US Census as updated for HUBB reporting.
Note 3: Year 1 is 2017
Note 4: Interior Telephone Company offers broadband service in areas where reasonably priced Fiber middle mile is available and areas where only Satellite middle mile is available. Broadband benchmark speeds and pricing as provisioned over each type of middle mile are provided as of Year 1 - 2017. Pricing is subject to access to affordable middle mile facilities .
Note 5: In addition to the newly deployed/upgraded locations, Interior Telephone Company commits to maintain existing service throughout the 10-year term to locations with access to only satellite backhaul with speeds of 1Mbps/256kbps.

[7] *See* Letter from Lisa Koker CFO, Cordova Telecom Cooperative, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 30, 2020).

[8] *See* Letter from Brett Carter, President and General Manager, TelAlaska, Inc. to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 30, 2020); Letter from Brett Carter, President and General Manager, TelAlaska, Inc. to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (July 7, 2020)

Mukluk Telephone Company, Inc.[9]

Middle Mile Facility	Speed to End User (Note 1)	Base Locations 12/31/2015 (Note 2)	Locations At Benchmark 12/31/15	Number of Locations Passed 12/31/2017	Percent of Locations At Benchmark Year 5 (Note 3)	Number of Locations at Benchmark Year 5	Percent of Locations At Benchmark Year 10	Number of Locations at Benchmark Year 10
Satellite	1Mb/256k	3,039	95.00%	2,887	38.29%	1,164	39.52%	1,201
Hybrid Microwave-Fiber	4Mb/1Mb							
Fiber	10Mb/1Mb				1.32%	40	1.00%	30
Fiber	25Mb/3Mb				57.68%	1,753	58.28%	1,771
Total		3,039	95.00%	2,887	97.29%	2,957	98.80%	3,002

Note 1: Residential speeds.
Note 2: Base Locations in ETC's network as of 12/31/15. Source is 2010 US Census as updated for HUBB reporting.
Note 3: Year 1 is 2017

Ketchikan Public Utilities[10]

Middle Mile Facility	Note 1	Note 2 Locations Passed 12/31/2015	% at Benchmark 12/31/2015	Number of Locations at Benchmark 12/31/15	% at Benchmark Year 5	Number of Locations at Benchmark Year 5	% at Benchmark Year 10	Number of Locations at Benchmark Year 10
Satellite	1Mb/256k							
Hybrid Microwave-Fiber	4Mb/1Mb							
Fiber	10Mb/1Mb	7,174	26.5%	1,901	1.0%	72	1.0%	72
Fiber	25Mb/3Mb	7,174	5.0%	359	11.0%	789	4.0%	287
Fiber	50Mb/5Mb	7,174	5.5%	395	7.0%	502	7.0%	502
Fiber	100Mb/5Mb	7,174	53.0%	3,802	77.0%	5,524	87.0%	6,241
	Revised Plan		90%	6,456	96%	6,887	99%	7,102
	Original Plan		90%	6,456	96%	6,887	99%	7,102
	Difference		0.00%	-	0.00%	-	0.00%	-

Note 1: Residential Speeds
Note 2: Locations passed in ETC's network as of 12/31/15.
Note 3: Year 1 is 2017

While KPU has signigicant inventment in fiber to the curb, the majority of locations are served with copper to the premise and will need to be upgrated at significant cost. Over the term of the Alaska Infrastructure Fund, KPU will install fiber to the premise to support increased bandwidth needs for our customers.

Base Locations include Census Housing Units, Census Private Nonfarm Establishments, non home based Census Nonemployer Establishments

Mantuska Telephone Association[11]

[9] *See id*. *See also* Letter from David J. Goggins, President and General Manager, TelAlaska, Inc., to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (May 17, 2019).

[10] *See* Letter from Daniel B. Lindgren, Assistant KPU Telecommunications Division Manager, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 30, 2020); Letter from Daniel B. Lindgren, Assistant KPU Telecommunications Division Manager, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (July 9, 2021).

Middle Mile Facility	Speed to End User (Note 1)	Locations Passed 12/31/2015 (Note 2)	Number of Locations At 12/31/2015	Percentage of Locations At Benchmark 12/31/2015	Number of Locations At Benchmark Year 5	Percentage of Locations At Benchmark Year 5	Number of Locations At Benchmark Year 10	Percentage of Locations At Benchmark Year 10
Satellite	1Mb / 256k							
Hybrid Microwave-Fiber	4Mb / 1Mb							
Fiber	10Mb / 1Mb	48,766	35,723	73%	19,078	39%	8,526	17%
Fiber	25Mb / 3Mb				15,027	31%	19,540	40%
Fiber	50Mb / 5Mb				8,518	17%	15,500	32%
Fiber	100Mb / 20Mb				1,500	3%	4,000	8%

Note 1: Residential sppeds
Note 2: Locations passed in MTA's network as of 12/31/2015
Note 3: Year 1 is 2017
Note 4: Locations are based on known locations
Note 5: In accordance with MTA's updated end-of-term performance commitment filed with the FCC and dated December 30, 2020, MTA is updating all 100Mb/5Mb speed tier obligations by upgrading the speed tier to 100Mb/20Mb.

Nushagak Electric and Telephone Cooperative[12]

Carrier	Study Area Code	Backhaul	Speed	Base Locations	% At or Above Benchmark 01/01/17	% At or Above Benchmark Year 5 12/31/21	% At or Above Benchmark Year 10 12/31/26
Nushagak Electric & Telephone Cooperative	613018	Microwave	6/1 Mbps	1217	83.00%	95.00%	17.83%
		Fiber	100/20 Mbps	1217	n/a	n/a	82.17%

Note 1: Upgrade to fiber assumes the completion of the current project that will transition NETC to fiber middle mile facilities.
Note 2: Nushagak will clarify the status relative to the speed upgrade of the 146 newly deployed locations by December 31, 2023.

OTZ Telephone Cooperative[13]

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[11] *See* Letter from Michael C. Burke, Chief Executive Officer, Matanuska Telephone Association, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 30, 2020); Letter from Ryan Ponder Director Legal, Regulatory, and Government Affairs, Matanuska Telephone Association, Inc. to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (July 27, 2021); Letter from Ryan Ponder Director Legal, Regulatory, and Government Affairs, Matanuska Telephone Association, Inc. to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Sept. 24, 2021).

[12] *See* Letter from Jeffry H. Smith VP of Public Policy and Advocacy, Vantage Point, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 22, 2020) (Nushagak Electric and Telephone Cooperative), Letter from Jeffry H. Smith VP of Public Policy and Advocacy, Vantage Point, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Nov. 4, 2021).

Middle Mile Facility	Speed to End User (Note 1)	Locations Passed 12/31/2015 (Note 2)	Locations at Benchmark 12/31/2015	Locations at Benchmark Year 5	Locations at Benchmark Year 10
Satellite - Note 4	1Mb/256k	2,776	0%	0%	0%
Satellite - Note 4	4Mb/1Mb	2,776	100%	75%	55%
Fiber	10Mb/1Mb	2,776	-	0%	0%
Fiber	25Mb/3Mb	2,776	-	25%	45%

Note 1: Residential speeds.
Note 2: Locations in ETC's network as of 12/31/15.
Note 3: Due to high cost of middle mile transport, broadband speeds are not affordable to most of OTZ's customers.
Note 4: Year 1 is the year fundiing under the AIF begins

OTZ Telephone Cooperative's last mile network as of 12/31/2015 is capable of delivering broadband speeds of 4Mb/1Mb and OTZ currently has a 6Mb/1Mb package available to customers. However, Due to the high cost of middle mile transport, both the 4Mb/1 and 6Mb/1Mb package are beyond the financial reach of most residential customers.

OTZ Telephone Cooperative is committed to offering the best possible communication service to its members and will continue to upgrade the last mile network, by replacing aging copper plant with fiber and upgrading core electronics to support fiber to the home.
OTZ plans on replacing all aging Dslams with VDSL capable Dslams.
For multi family dwellings (larger apartment building) OTZ plans to install fiber fed VDSL Dslams in the apartment buildings communication room. With this model OTZ will be able to mitigate the negative impact of category 3 wiring that is embedded in older apartment buildings.

GCI Communication Corp. (United Utilities, Inc. – Yukon Telephone)[14]

Middle Mile Facility	Speed to End User (Note 1)	Locations Passed 12/31/2015 (Note 2)	Locations at Benchmark 12/31/2015	Locations at Benchmark Year 5	Locations at Benchmark Year 10	Usage Allowance	Retail Price (Note 3)
Satellite	1Mb/256k	1,687	37%	100%	100%	7 GB	$99.99
Microwave	4Mb/1Mb	8,621	100%	50%	0%	25 GB	$99.99
	10Mb/1Mb		0%	50%	100%	40 GB	$149.99
Fiber	25Mb/3Mb	324	0%	100%	100%	150 GB (subject to update)	Alaska-specific benchmark

Note 1: Residential speeds.
Note 2: Locations passed by ILEC's network as of 12/31/15.
Note 3: Price is for broadband when purchased with voice.
Note 4: Year 1 is 2017.

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[13] *See* Letter from Chris Barron, Regulatory Director, Alexicon Telecommunications Consultants, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 29, 2020) (OTZ Telephone Cooperative); Letter from Chris Barron, Regulatory Director, Alexicon Telecommunications Consultants, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (July 8, 2021) (OTZ Telephone Cooperative); Letter from Chris Barron, Regulatory Director, Alexicon Telecommunications Consultants, to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Oct. 15, 2021); ATA May 9, 2016 *Ex Parte* at 18.

[14] *See* Letter from Julie A. Veach Counsel to GCI Communication Corp., to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Dec. 23, 2020); Letter from Julie A. Veach Counsel to GCI Communication Corp., to Marlene Dortch, Secretary, FCC, WC Docket No. 16-271 (Sept. 8, 2021).

APPENDIX B
RATE-OF-RETURN ALASKA PLAN CARRIERS
HUBB LOCATIONS

Admin SAC	Carrier Name	Speed (Mbps)	Middle Mile	5 Year Obligation Newly Deployed, Upgraded Locations by Dec. 31, 2021	Minimum Total Locations Certified in the HUBB by Mar. 1, 2022	10 Year Obligation Newly Deployed, Upgraded Locations by Dec. 31, 2026	Minimum Total Locations Certified in the HUBB by Mar. 1, 2027
613001	ARTC	25/5	Hybrid	161		161	
613001	ARTC	25/5	Fiber	2156		2156	
		Total 25/5		2317		2317	
					2317		**2317**
613006	CPPR	25/3	Fiber	138		138	
613006	CPPR	50/5	Fiber	278		278	
613006	CPPR	1000/100	Fiber	2828		3515	
					3244		**3931**
613007	CRDV	25/3	Fiber	17		0	
613007	CRDV	50/5	Fiber	255		0	
613007	CRDV	100/5	Fiber	425		850	
					697		**850**
613011	AMRC (Interior)	10/1	Fiber	124		124	
613011	AMRC (Interior)	25/3	Fiber	2925		2925	
					3049		**3049**
613011	AMRC (Mukluk)	1/256k	Satellite	0		37	
613011	AMRC (Mukluk)	10/1	Fiber	40		30	
613011	AMRC (Mukluk)	25/3	Fiber	1753		1771	
					1793		**1838**
					4842		**4887**
613013	CTYF3	25/3	Fiber	430		287	
613013	CTYF3	50/5	Fiber	107		107	
613013	CTYF3	100/5	Fiber	1722		2439	
					2260		**2833**
613015	MTNS	25/3	Fiber	15027		19540	

Admin SAC	Carrier Name	Speed (Mbps)	Middle Mile	5 Year Obligation Newly Deployed, Upgraded Locations by Dec. 31, 2021	Minimum Total Locations Certified in the HUBB by Mar. 1, 2022	10 Year Obligation Newly Deployed, Upgraded Locations by Dec. 31, 2026	Minimum Total Locations Certified in the HUBB by Mar. 1, 2027
613015	MTNS	50/5	Fiber	8518		15500	
613015	MTNS	100/20	Fiber	1500		4000	
					25045		**39040**
613018	NSHG	6/1	Microwave	146		146	
		100/20	Fiber	0		1000	
					146		1146[23]
613019	OTZT	25/3	Fiber	694	**694**	1249	**1249**
613023	GNRL	1/256k	Satellite	1063		1063	
613023	GNRL	10/1	Microwave	4311		8621	
613023	GNRL	25/3	Fiber	324		324	
					5698		**10008**
610989	ADKG	2/1	Satellite	346		346	
					346		**346**
613003	BRST	10/1	Fiber	0		1027	
613003	BRST	25/3	Fiber	0		9	
					0		**1036**

No Obligation for Newly Deployed/Upgraded Locations	
613004	BSHT
613005	CRCL

[23] *See supra* Appendix A, Performance Obligations of Nushagak Electric and Telephone Cooperative, Note 2 (Nushagak will clarify the status relative to the speed upgrade of the 146 newly deployed locations by December 31, 2023).