

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Connect America Fund—Alaska Plan) WC Docket No. 16-271
GCI Communication Corp. Petition for Limited,)
Expedited Waiver in the Alaska Plan for Drive-)
Test Data Collection)

ORDER

Adopted: July 31, 2023

Released: July 31, 2023

By the Chief, Wireless Telecommunications Bureau:

I. INTRODUCTION

1. By this Order, the Wireless Telecommunications Bureau (Bureau) affirms that a speed of at least 15 mph is, in general, a necessary floor for in-motion drive testing for Alaska Plan participants, grants GCI’s Petition for Limited, Expedited Waiver (Petition)1 with a modification, and partially grants the Supplement to Petition, as specified below.2 Specifically, for all 45 grid cells in the initial Petition and three additional grid cells in the Supplement to Petition, where GCI seeks a waiver of the 15 mph threshold for in-motion drive tests and asks that the original drive tests be accepted, we waive the 15 mph threshold for those grid cells.3 We do not take action at this time on the additional 107 grid cells where GCI sought waiver of the 15 mph threshold on the grounds that those grid cells are roadless.4 We also grant an extension of GCI’s deadline for completing all drive retesting until October 2, 2023.

II. BACKGROUND

2. The Alaska Plan Order required mobile-provider participants receiving more than \$5 million annually to support their year five and year ten “minimum upload and download speed certifications” with “data from drive tests showing mobile transmissions to and from the network meeting

1 GCI Communication Corp. Petition for Limited, Expedited Waiver, WC Docket No. 16-271 (filed June 26, 2023) (Petition); GCI Communications Corp. Supplemental Waiver Petition, WC Docket No. 16-271 (filed July 18, 2023) (Supplement to Petition).

2 Letter from Garnet Hanly, Chief, Competition and Infrastructure Policy Division, Wireless Telecommunications Bureau, FCC, to Chris Nierman, Vice President & Senior Counsel, Federal Affairs, GCI (June 2, 2023) (Letter), attached to Email from Matthew Warner, Attorney Advisor, Competition and Infrastructure Policy Division, Wireless Telecommunications Bureau, FCC, to Chris Nierman, Vice President & Senior Counsel, Federal Affairs, GCI, Attach. 2 (June 2, 2023 11:38 ET).

3 See infra, Appendix.

4 GCI initially sought waiver of the 15 mph threshold for 45 grid cells, based on the individual circumstances of those grid cells. See Petition. GCI filed the Supplement to Petition seeking relief for 3 grid cells where such testing would be unsafe and for another 107 grid cells because they did not have roads. See Supplement to Petition. We grant the waiver for the 3 grid cells where GCI demonstrated it is unsafe to test at 15 mph in the Supplement to Petition, but we do not yet make a determination on the other 107 grid cells where waiver of the 15 mph threshold is sought on the grounds that those grid cells do not have roads. See infra, para. 13.

or exceeding the speeds delineated in the approved performance plans.”⁵ The *Alaska Drive Test Order* provided the following requirements: “Within each selected grid cell, a carrier must conduct a minimum of 20 tests, no less than 50% of which are to be conducted while in motion from a vehicle. . . . A mobile test should initiate when moving away from the location of a stationary test after having reached the speed of the surrounding traffic, or a safe and reasonable operating speed in the event no traffic is present.”⁶ Under the drive-test methodology, if a grid cell does not meet the requirements set forth in the *Alaska Drive Test Order* (including the 50% threshold for in-motion drive tests), the grid cell does not “pass,” and the population in that grid cell would not be counted toward population coverage commitments.⁷

3. In response to GCI’s drive-test submission for its five-year certification, Commission staff sent a letter regarding GCI’s use of low in-motion driving speeds (Letter).⁸ The Letter stated that the low driving speeds of some of the in-motion tests were inconsistent with the requirements of the *Alaska Plan Order* and the *Alaska Drive Test Order*.⁹ Specifically, the Letter stated that, “[i]n a significant number of grid cells, most of GCI’s in-motion drive tests were performed at extremely low speeds that do not approximate reasonable operating speeds or the ‘speed of the surrounding traffic’”; that “[m]any of GCI’s mobile tests were performed at speeds between 0-14 mph”; and that with respect to those tests performed at speeds between 0 and 14 mph, “a large number of tests were performed at 2 mph or less.”¹⁰ The Letter also stated that, “[a]s a result, many of GCI’s grid cells ‘fail’ because the grid cells do not have 50% or more in-motion drive tests.”¹¹ Because a minimum speed was not specifically enumerated in the rules, however, the Letter offered GCI the option to retest grid cells where GCI’s in-motion testing speed was too low (i.e., below 15 mph) or where GCI skipped testing the grid cell initially.¹² The Letter explicitly noted that GCI could seek a waiver where performing in-motion tests at 15 mph or above might be unsafe or illegal in a particular grid cell.¹³ If GCI accepted the offer,¹⁴ GCI was to complete the drive testing by August 2.¹⁵ Accompanying the Bureau letter was a list of 465 grid cells that could be retested.¹⁶

⁵ *Connect America Fund et al.*, WC Docket Nos. 10-90 and 16-271, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139, 10173, para. 103 (2016) (*Alaska Plan Order*); accord 47 CFR § 54.321.

⁶ See *Connect America Fund—Alaska Plan*, WC Docket No. 16-271, Order and Request for Comment, DA 22-484, at 47-48, Appx. B (WTB May 5, 2022) (*Alaska Drive Test Order*).

⁷ See *Alaska Drive Test Order* at 43-49, Appx. B.

⁸ Letter from Garnet Hanly, Chief, Competition and Infrastructure Policy Division, Wireless Telecommunications Bureau, FCC, to Chris Nierman, Vice President & Senior Counsel, Federal Affairs, GCI (June 2, 2023) (Letter), attached to Email from Matthew Warner, Attorney Advisor, Competition and Infrastructure Policy Division, Wireless Telecommunications Bureau, FCC, to Chris Nierman, Vice President & Senior Counsel, Federal Affairs, GCI (June 2, 2023, 11:38 ET).

⁹ Letter at 1.

¹⁰ Letter at 1.

¹¹ Letter at 1.

¹² Letter at 1-2. We are allowing GCI to retest the grid cells it skipped the first time in case the reasons or analysis that it used in its determination to skip them have changed upon retesting.

¹³ Letter at 2 n.3.

¹⁴ Letter at 2 (“If GCI wants to avail itself of this option, GCI must reply within seven (7) days from the date of this letter, stating whether it would be interested in retesting the grid cells where it did not have a sufficient percentage of mobile tests and/or skipped grid cells.”).

¹⁵ Letter at 2 (“If GCI accepts, it will have two (2) months to retest the specified grid cells (attached)—in those grid cells, it must completely redo testing (i.e., stationary and mobile tests).”). GCI was sent the Letter on June 2, 2023. Email from Matthew Warner, Attorney Advisor, Competition and Infrastructure Policy Division, Wireless

(continued....)

4. After accepting the offer to retest these grid cells, GCI filed a Petition for Limited, Expedited Waiver on June 26, 2023.¹⁷ GCI argues that the “speed specification was first provided to GCI . . . nine months after GCI completed its drive testing”¹⁸ and asks the Bureau to “carefully consider whether a 15 MPH requirement is truly necessary” for the grid cells specified in its Petition¹⁹ as the Letter “does not explain the basis for concluding that 15 MPH is the lowest speed that would be considered a ‘safe and reasonable operating speed’ or ‘the speed of the surrounding traffic.’”²⁰ From the list of grid cells the Competition and Infrastructure Policy Division (Division) sent to GCI for retesting, GCI identifies 45 grid cells that it claims would be unsafe to drive at 15 mph or faster; would have limited accessibility; would be too costly to retest; or would have initial drive tests that were conducted at speeds close to 15 mph.²¹ For these 45 grid cells, GCI seeks to waive the 15 mph threshold and requests that Commission staff analyze the initial data that were submitted for those grid cells.²² GCI further identifies 90 additional grid cells that are likely affected by a recent outage of Quintillion’s fiber cable.²³ For these 90 grid cells, GCI requests two additional consecutive months—within May to October—to retest after the cable is repaired.²⁴ For all remaining grid cells that GCI is retesting, GCI requests that the deadline to submit results be October 2, 2023, rather than August 2.²⁵

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Telecommunications Bureau, FCC, to Chris Nierman, Vice President & Senior Counsel, Federal Affairs, GCI (June 2, 2023, 11:38 ET).

¹⁶ Email from Matthew Warner, Attorney Advisor, Competition and Infrastructure Policy Division of the Wireless Telecommunications Bureau, FCC, to Chris Nierman, Vice President & Senior Counsel, Federal Affairs, GCI, Attach. 2 (June 2, 2023 11:38 ET).

¹⁷ Petition.

¹⁸ Petition at 1.

¹⁹ Petition at 1.

²⁰ Petition at 3.

²¹ Petition at 5-15.

²² Petition at 1-15. The Commission sent GCI two lists of grid cells for re-testing. The first list contained the grid cells where it did not complete a sufficient number of mobile tests; the second list contained the grid cells where it did not complete enough tests in total (i.e., it performed fewer than 20 stationary and mobile tests in a grid cell). See Email from Matthew Warner, Attorney Advisor, Competition and Infrastructure Policy Division of the Wireless Telecommunications Bureau, FCC, to Chris Nierman, Vice President & Senior Counsel, Federal Affairs, GCI, Attach. 2 (June 2, 2023 11:38 ET). The second list likely includes those grid cells that GCI chose not to drive test at all the first time. It is unclear from GCI’s Petition whether it seeks any alternative relief for those grid cells where GCI seeks a waiver but it did not have sufficient data in the first round of testing. For example, GCI seeks a waiver for grid cell G22650342 in Kodiak. See Petition at 1, 4, 5, Attach. A. GCI notes that this grid cell is inaccessible for testing, so it does not have previous drive test data for this grid cell, but GCI has not sought a proxy cell for this grid cell or other relief. See Letter from Julie A. Veach, Counsel to GCI, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 16-271 (filed June 13, 2022); Petition at 12; see also *Connect America Fund—Alaska Plan*, WC Docket No. 16-271, Order, DA 22-755 (WTB Jul. 13, 2022). To address this potential discrepancy, we allow GCI to choose to re-test any of the grid cells for which GCI sought a waiver of the 15 mph threshold, as described more fully below. See *infra*, para. 12.

²³ Petition at 16-20; see also Greg Knight & Chris Klint, Cut Cable Causes Internet and Cellphone Outages in Arctic Alaska, *Alaska Public Media* (June 12, 2023) (noting long-term outage of likely six to eight weeks from Quintillion’s cut fiber cable off of the Northern Alaska coast), <https://alaskapublic.org/2023/06/12/cut-cable-causes-weeks-long-north-slope-northwest-alaska-internet-and-cellphone-outages/>.

²⁴ Petition at 18.

²⁵ Petition at 2.

5. GCI filed a supplement to its Petition on July 18, 2023 (Supplement to Petition).²⁶ In this supplement, GCI seeks to waive the 15 mph threshold for an additional 110 grid cells. GCI asserts that three of these grid cells present circumstances similar to those identified in its Petition and are unsafe to drive at 15 mph.²⁷ GCI asserts that the remaining 107 grid cells should not be subject to the minimum speed requirement where “the adopted Alaska Population-Distribution Model indicates that the grid cell has no road.”²⁸ According to GCI, a 15 mph minimum speed threshold is unsuited to areas without roads and would not reflect actual consumer use in these areas.²⁹ Additionally, GCI clarifies that references to grid cell numbers in its initial Petition should reflect proxy cells where one was assigned.³⁰

III. DISCUSSION

6. We affirm that 15 mph is, in general, a necessary floor for the in-motion drive testing required for the Alaska Plan drive testing. We waive this requirement and will analyze the initial drive test data with respect to the 48 grid cells GCI claims would be unsafe to drive at 15 mph or faster, would have limited accessibility, would be too costly to retest, or would have original drive test data collected at speeds close to the in-motion 15 mph threshold. We also extend the drive test deadline to October 2, 2023, for submission of all retested data.

7. The Commission may waive any provision of the rules on its own motion or on petition “for good cause shown.”³¹ The “good cause shown” standard can be met when the Commission finds that (1) “special circumstances warrant a deviation from the general rule”; and (2) “such deviation will serve the public interest.”³² A rule waiver may serve the public interest when the relief would not undermine the policy objectives of the rule.³³ In this case, granting a limited waiver of the 15 mph threshold for the specified grid cells and extending the submission date for all of the retested data to October 2, 2023, meets both prongs of the test.

8. As an initial matter, we affirm that, in general, a speed of at least 15 mph is necessary to be considered a reasonable operating speed for the Alaska Plan in-motion drive testing. GCI asks the Bureau to consider carefully whether a 15 mph threshold is truly necessary for the grid cells it specifies in its Petition and notes that we did not explain the basis for the 15 mph threshold in the Letter.³⁴ While we recognize that the *Alaska Drive Test Order* did not specify a particular driving speed, it did require GCI to conduct tests at “the speed of the surrounding traffic” or at “a safe and reasonable operating speed.”³⁵ Common sense dictates that drive tests in general should be performed at a driving speed, rather than at a walking or running speed. Because so many of GCI’s in-motion drive tests were performed at speeds

²⁶ Supplement to Petition at 1.

²⁷ Supplement to Petition at 2-3.

²⁸ Supplement to Petition at 3-5.

²⁹ Supplement to Petition at 3-5.

³⁰ Supplement to Petition at 5-6.

³¹ 47 CFR § 1.3.

³² *E.g., Ne. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *see WAIT Radio v. FCC*, 418 F.2d 1153, 1157-59 (D.C. Cir. 1969) (*WAIT Radio*).

³³ *See WAIT Radio*, 418 F.2d at 1157.

³⁴ Petition at 1, 3. GCI does not seek a waiver of the 15 mph threshold for 310 of the 465 grid cells that the Commission staff sent back for retesting for failing the in-motion threshold. *See generally* Petition; Supplement to Petition.

³⁵ *Alaska Drive Test Order* at 48, Appx. B; *see also Alaska Plan Order*, 31 FCC Rcd at 10173, para. 103 (requiring drive tests); *Alaska Drive Test Order* at 18-20, paras. 34-36.

more associated with walking speeds rather than reasonable driving speeds,³⁶ Division staff found it necessary to specify a driving speed threshold to clarify the requirement of performing tests at “the speed of surrounding traffic, or a safe and reasonable operating speed.”³⁷ We have given GCI a second opportunity to perform its drive tests at this threshold so that we can have an accurate understanding of whether GCI has met its commitments.

9. For the 36 grid cells where GCI claims that it would be unsafe to test at 15 mph or that it has limited ability to access, we waive the 15 mph threshold and will analyze the initially submitted data. While 15 mph or greater is consistent with a drive test of a mobile service, the Letter recognized that a waiver may be warranted in certain grid cells “where speeds of 15 mph or above may be unsafe or illegal” in that particular grid cell.³⁸ GCI has demonstrated that 36 grid cells would be unsafe to test at 15 mph or greater because they involve boardwalks (11 grid cells),³⁹ water hazards (14 grid cells),⁴⁰ short roads and unpaved paths (7 grid cells),⁴¹ and grid cells with limited access (4 grid cells).⁴² As GCI has shown that testing these grid cells above 15 mph could pose safety risks, we find that the hazards in these particular grid cells are special circumstances that warrant a deviation from the 15 mph threshold. Moreover, waiver of the 15 mph threshold here is in the public interest as the hazards suggest that consumers would likely use their mobile service at less than 15 mph in these particular grid cells, and the objective of the 15 mph threshold is to reflect how the mobile network performs when the user is moving.

10. For the ten grid cells that GCI indicates are extremely costly to retest, we grant GCI’s petition, waive the 15 mph threshold, and will analyze the initial data.⁴³ GCI explains that these grid cells are hard to reach, require charter of a helicopter, and in any event, most would not have “traffic” at speeds of 15 mph “because the speed[] . . . tested reflect[s] the speed at which it is customary to move or travel within that grid cell.”⁴⁴ We find that these circumstances are special circumstances that warrant a deviation from the 15 mph threshold, and the public interest is served by relying on the initially submitted data, as it would be unduly burdensome to retest the *de minimis* number of grid cells at issue that were originally tested at speeds which are customary to move or travel within the specified grids.

³⁶ Many of GCI’s tests were conducted at less than 3 mph, which is considered to be a walking speed. *See, e.g.,* Elizabeth Millard, *Slow Walkers Might Age Faster than People Who Pick Up the Pace*, Runners World (Oct. 11, 2019) (reporting on a study indicating that slow walkers walk at 2.7 mph and faster walkers, 3.9 mph), <https://www.runnersworld.com/news/a29429593/walking-speed-affects-aging/>. 15 mph is the lowest recognized vehicle speed limit in Alaska and is the speed limit reserved for driving down an alley, which is not the type of driving that GCI is concerned with in its Petition or Supplement to Petition. 13 Alaska Admin. Code § 02.275 (Basic Rule and Maximum Limits), <https://www.akleg.gov/basis/aac.asp#13.02.275>; *see also* Petition; Supplement to Petition. Business districts have a speed limit of 20 mph, and residential areas have a speed limit of 25 mph, which are higher than the minimum driving threshold.

³⁷ *See Alaska Drive Test Order* at 48, Appx. B. We note that a threshold of 15 mph for in-motion tests is a generous threshold for such testing. For example, for the drive tests required as part of the conditions of the T-Mobile/Sprint transaction, T-Mobile must perform drive tests at “vehicular speeds varying generally between 25-60 mph.” T-Mobile USA, Inc., Methodology for T-Mobile Drive Tests to Verify Compliance with T-Mobile/Sprint Merger Commitments at 4 (Jan. 8, 2020), <https://www.fcc.gov/sites/default/files/t-mobile-drive-test-methodology-01082021.pdf>.

³⁸ Letter at 2 n.3; *see also Alaska Drive Test Order* at 47-48, Appx. B.

³⁹ Petition at 6-8, 30-40; Supplement to Petition at 2.

⁴⁰ Petition at 8-9, 41-54; Supplement to Petition at 2.

⁴¹ Petition at 9-10, 55-62. Four of these grid cells are also on oil field property. Petition at 10-11, 63-67.

⁴² Petition at 11-12, 68-71; Supplement to Petition at 2.

⁴³ *See* Petition at 12-14.

⁴⁴ Petition at 12-13.

11. Finally, for the two grid cells for which the initial drive tests were conducted at speeds close to 15 mph for the in-motion tests, we grant GCI's petition, waive the 15 mph threshold, and will analyze the initial data.⁴⁵ The 15 mph threshold is intended to ensure that GCI's in-motion drive tests occur at the speed of surrounding traffic or at a reasonable and safe operating speed. For the two identified grid cells where GCI came within 2 mph of 15 mph, retesting these grid cells at speeds of at least 15 mph is unlikely to change the outcome of the tests and, thus, does not undermine the policy objectives behind the requirement. Accordingly, we find it unnecessary for GCI to incur the cost of retesting these grid cells.

12. Despite the waiver of the retesting requirement for the 48 grid cells, we will allow GCI to voluntarily retest any of those grid cells should it so choose.⁴⁶ Because so many of GCI's in-motion drive tests were performed at such low moving speeds, however, we find it necessary to specify a threshold to ensure that the same issue does not arise if GCI chooses to retest any of these grid cells. Based on GCI's demonstration in its Petition, we recognize that 15 mph may not be a "safe and reasonable operating speed" for these particular grid cells. Accordingly, for any voluntary retest of the 48 grid cells specified in GCI's Petition and Supplement to Petition, a test will be considered in-motion if conducted at speeds of at least the second-fastest speed from its initial testing for that grid cell (defined as the average speed for an uplink and downlink paired test) rounded down to the nearest mile per hour. For example, in grid cell G17360788, where the second-fastest speed was 4.13 mph, a test would be considered in motion if it were at least 4 mph in that grid cell. We choose the second-fastest speed, as this is a speed that has been demonstrated as safe to be tested in that grid cell while eliminating the top speed as a potential outlier. For the two grid cells in which the test was performed at just under the 15 mph threshold, any re-test must meet the threshold for the in-motion portion of those tests.

13. We do not act on the Supplement to Petition for the remaining 107 grid cells in this Order. Commission staff met with GCI on July 26, 2023 asking GCI to provide more information regarding these grid cells. We anticipate addressing the 107 roadless grid cells after receipt of this information.

14. For all remaining grid cells for retesting—including those 90 additional grid cells affected by the Quintillion outage and the 107 roadless grid cells in the Supplement to Petition—and not subject to other waiver treatment in this Order, we grant GCI's Petition, with a modification, and extend the deadline for all retested grid cells to October 2, 2023. For those grid cells affected by the Quintillion fiber cut—which will cause service disruption for a predicted minimum of 6-8 weeks after it occurred about June 11, 2023⁴⁷—GCI requests two additional consecutive months to retest after the fiber outage is repaired⁴⁸ and that the testing months be between May and October,⁴⁹ allowing for the possibility that

⁴⁵ See Petition at 14-15.

⁴⁶ For example, GCI may not have performed a sufficient number of tests for some of the grid cells in its original drive testing, or may have entirely skipped some grid cells the first time around. See Email from Matthew Warner, Attorney Advisor, Competition and Infrastructure Policy Division of the Wireless Telecommunications Bureau, FCC, to Chris Nierman, Vice President & Senior Counsel, Federal Affairs, GCI, Attach. 2 (June 2, 2023 11:38 ET). Where GCI does not submit new drive test data as part of its retesting, Commission staff will have to rely on the data that were submitted in the initial testing, which includes some grid cells where GCI did not have a sufficient number of drive tests to pass. While we are granting the waiver as requested, GCI may want to consider the implications of choosing not to re-test certain grid cells, such as those where there were not a sufficient number of tests performed.

⁴⁷ See Petition at 16-17.

⁴⁸ Petition at 17-18.

⁴⁹ Petition at 18.

testing these areas would occur in 2024.⁵⁰ GCI separately asks that the deadline for submission of the grid cells that were not listed in the Petition be due on October 2, 2023, instead of August 2, to “provide a more realistic opportunity to test in these remote areas.”⁵¹ In response to both requests for more time, we extend the deadline for all retested grid cells to October 2, 2023. The untimely cut of the Quintillion fiber line is a special circumstance that warrants an extension of the deadline for those data, and the 6-8 week prediction of service disruption aligns with the requested October 2, 2023 date for other grid cells. Further, aligning the timelines allows GCI to submit all of its data in one batch to make efficient use of any quality check efforts it will give the data before submission. If the Quintillion fiber cut persists far beyond the predicted repair date, allowing inadequate time for testing before the October 2 deadline, then the onset of the Alaskan winter could cause further delays until next year. GCI must therefore complete what testing it can before the October 2 deadline and submit another request for waiver, with sufficient justification, to seek relief for any grid cells for which it could not complete testing.

IV. ORDERING CLAUSES

15. Accordingly, IT IS ORDERED, pursuant to the authority contained in sections 1-4, 201, 254, 301, 303, 308, 309, and 332 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151-154, 201, 254, 301, 303, 308, 309, 332, and sections 0.131, 0.311, 1.3, 54.317, 54.320, and 54.321 of the Commission’s rules, 47 CFR §§ 0.131, 0.311, 1.3, 54.317, 54.320, 54.321, and the delegated authority contained in the *Alaska Plan Order*, 31 FCC Rcd 10139, 10160, 10166-67, paras. 67, 85, that these waivers ARE ADOPTED.

16. IT IS FURTHER ORDERED that, pursuant to section 1.102(b)(1) of the Commission’s rules, 47 CFR § 1.102(b)(1), this Order SHALL BE EFFECTIVE upon release.

FEDERAL COMMUNICATIONS COMMISSION

Joel Taubenblatt
Chief,
Wireless Telecommunications Bureau

⁵⁰ If Quintillion releases a statement in the last week of August indicating that the fiber is repaired, for example, this scenario would not allow for two consecutive months before October 2 to test these 90 grid cells, which means that the testing would be delayed until May 2024 and would not conclude until July 2024 at the earliest.

⁵¹ Petition at 2, 15-16.

**APPENDIX:
List of 48 Grid Cells For Which A Waiver of 15 MPH is Granted**

G13820092	Akutan
G13830092	Akutan
G13820091	Akutan
G16500992	Nunam Iqua (Sheldon Point)
G16500991	Nunam Iqua (Sheldon Point)
G16520993	Nunam Iqua (Sheldon Point)
G17370786	Nunapitchuk
G17370787	Nunapitchuk
G19631397	Selawik
G19641397	Selawik
G19130576	Aleknagik
G17330788	Kasigluk
G17330790	Kasigluk
G35520262	Ketchikan
G35560261	Ketchikan
G31960634	Klukwan
G16230815	Newtok
G17360788	Nunapitchuk
G22660391	Ouzinkie
G34270400	Petersburg
G24531774	Prudhoe Bay
G33220424	Sitka
G23990795	Valley
G32790543	Juneau
G35650235	Metlakatla
G34280398	Petersburg
G24031773	Prudhoe Bay
G24251794	Prudhoe Bay
G24261789	Prudhoe Bay
G24681773	Prudhoe Bay
G32750549	Juneau
G32760549	Juneau
G22650342	Kodiak
G13780092	Akutan
G15521392	Diomedes
G19750450	Egegik
G19740446	Egegik
G24411150	Nenana
G24881774	Prudhoe Bay
G15860782	Toksook Bay
G19791393	Selawik
G19801392	Selawik
G19801393	Selawik
G26360691	Cordova
G27401016	Tok
G16300699	Kipnuk
G20821172	Galena
G24020770	Valley