

**STATEMENT OF  
COMMISSIONER MIGNON L. CLYBURN  
APPROVING IN PART AND DISSENTING IN PART**

Re: *Connect America Fund*, WC Docket No. 10-90.

Just over a month ago, the Commission adopted an Order—from which I dissented—that gave hundreds of millions of dollars in universal service support to overlapping wireless providers, instead of using the excess money to improve the paucity of middle-mile capacity in Alaska.

Now, we are on the cusp of approving another Order that fails to improve service to Bush Alaska. This Order is further evidence that we got the Alaska Plan wrong. If we got it right, we could have used that as a basis for requiring Alaska Communications Services (ACS) to bring broadband to the Bush. But without improved middle-mile, it is financially infeasible for them to do so. I am deeply disappointed that we cannot bring these rural communities out of the digital darkness. Duplicate funding elsewhere means no broadband for the neediest in rural Alaska.

Nonetheless, I am opting to support this Order, generally. Thousands of Alaskans who did not have broadband will be connected as a result of this Order and I applaud my fellow Commissioners, particularly Commissioner Pai, for pushing the envelope on the number of locations that ACS must serve with broadband. This is a win for Alaska.

I must dissent, however, from the grant of forbearance from eligible telecommunications carrier (ETC) obligations that I previously objected to in 2014 for the lower-48 price cap carriers. The item forbears from ETC obligations in three broad areas: (1) census blocks that the cost model determines are “low cost;” (2) census blocks served by an unsubsidized competitor; and (3) census blocks where another ETC receives support likely due to winning the competitive bidding process. These are all problematic, but particularly concerning is the forbearance for low-cost census blocks.

As I have said before, granting forbearance from this category puts an incredible amount of faith in the cost model’s projection. This is belied by the record. Here, we require ACS to certify that certain locations the model says are low cost, are indeed high cost. And yet we still have confidence that the model is accurate for other “low cost” blocks?

Nevertheless, I want to thank the staff of the Wireline Competition Bureau not only for the hard work that went into presenting this Order, but their efforts to help bring broadband to the citizens of Alaska.