

January 25, 2021

Marlene H Dortch  
Secretary  
Federal Communications Commission  
45 L Street N.E.  
Washington D.C. 20554

Re: IBFS File No. SAT-MOD-20200417-00037

Dear Ms. Dortch-

I am a Technology Contractor in Western Alaska. I provide technology services and assistance to Tribal Organizations and Businesses in the Yukon Kuskokwim Delta. My service area is the size of Ohio in which 56 villages exist and are not interconnected by roads. I have been providing this service for over 20 years. As the Internet has grown and become the mainstay of our economy and communication systems, I have been in the trenches making "lemonade out of lemons" with regard to making Internet available to our villages.

In the early days I flew out to villages in my own plane to install systems connected to 33.6 dialup modems and then installations of Starband or HughesNet satellite service.

When people think of Alaska, they think of the gold fields of 1898. What they fail to realize that there is gold in Alaska, but it is not in mineral form, but in the form of lucrative USAC contracts that provide millions of dollars to Middle Mile companies. GCI/UUI, with their USDA funded Terra project spins the tale that they have spent "over \$200 million dollars in Rural Alaska." The missing part of that sentence is that they grossed \$500 million on eRate contracts in 5 years of service. While terabytes of data are provided to Schools and Health Corporations, Tribes, small businesses and consumers are left with very little.

In 2018, a rate review was conducted by the Universal Service Fund of GCI's Rural Alaska rates. Documents provide for that review that are freely available on the Internet show the following costs for service in Rural Alaska Village eRate customers:

Year 2012- \$47,520/month (\$570,240/year) for 12Mbps with 5 year contract

Year 2015- \$71,400/month (\$856,800/year) for 12Mbps with 5 year contract

Year 2017- \$61,692/month (\$740,304/year) for 12Mbps with 5 year contract

Obviously these rates are well outside of the capability of businesses and organization without the subsidies and out of the realm of reality for consumers.

I service a gold mine in southwest Alaska, that pays over \$8000/month for 2Mbps with 750ms latency. It has proven to be problematic and expensive.

In Western Alaska village Internet is provided by GCI and it's subsidiary UUI. A DSL connection (10Mbps) is \$299 per month for 100GB of service. After 100GB overages are charged at \$7.50/GB. BUT-- And this is the biggest issue-- After 20GB of overage, the service is terminated until the next month. Shut off. No exceptions. Even if the consumer or business wants to pay the overage, it is turned off. Wireless is available in some communities without a data cap, but is not as reliable as a wired connection and logistically not an option as well.

*John Wallace - Statement - SAT-MOD-20200417-00037*

Since this is the first of the year, I want to relate a story about one of my villages- Akiachak, Alaska. I mention this location because it is epitome of the issue.

In a Rural Alaska village there are two main entities in virtually every location-- The Tribal Organization and the Tribal Corporation. These organizations are the basis for the way of life in Rural Alaska. When I say Rural Alaska, I mean a village with no roads, where 4 wheeler, snowmachine, and boat are the primary means of transportation. In many locations running water and piped sewer are not available.

#### Example #1- Akiachak Limited (Tribal Corporation)

On December 30, I got a call from the manager. Their Internet was down. It is nearing the last day of the month, but unfortunately, due to a large windows update release, all internet has been terminated because the data has run out. This business runs the village store, electricity company, and fuel sales for the village. In addition they are basically the bank and cash checks for village residents. The Point of Sale operation requires Internet to make sales. All operations shut down. Worse, due to the pandemic I cannot travel to the village to assist configuring a new connection as the only alternative is to purchase another and install it.

#### Example #2- Akiachak Native Community (Tribal Organization)

I got a call from the Business Manager last summer. She was frustrated with the Internet and wanted help. They have 12-15 staff in the main office, but also run the Housing program, Indian Child Welfare Act, Roads/Transportation, and other social programs. Due to the pandemic they have been required to train on Covid and other functions via Zoom. Each zoom meeting is 6gb per day per person. They can't run payroll because the internet keeps terminating. They have purchased 3 dsl modems and she physically connects with ethernet extension cables computers that need access. I begin to assist by installing load balancing routers and other technology, but a Covid case jump locks down the village and I haven't been able to return to complete the project in over 2 months.

Our area, the Yukon-Kuskokwim Delta has the highest Covid rate in the nation. It has locked down village after village as the virus has passed through each village. In that circumstance very little support is available and travel is not authorized. People are virtually stuck and the businesses providing support are limited in their means to provide that support by the Internet literally being cut off.

This all brings me to SpaceX and Starlink and the possibility of Internet for all. Direct to consumer. I read one comment by Pacific Dataport - "What will 58 satellites do for Rural Alaska?" The company through one of it's partners, MicroCom has been providing access to a very limited area of Alaska for many years. Their comment made me laugh because Excede, one of their offerings is only available to a very small area of Alaska. 58 satellites will provide a great deal of service to underserved villages and remote operations. If it doesn't reach all of Alaska, whatever locations are served are just one more area that has an alternative.

I have heard other comments that the \$500 equipment cost makes the service not within the realm of consumers. Let me tell you this-- Most homes in Rural Alaska have 1.2 meter Dish Network antennas that are VERY expensive to transport. This is just for television. Most people have cell phones that cost well over \$500 as well. The other factor is the self installing nature of the SpaceX equipment that makes it very appealing to people in remote areas. It is very costly to transport trained installers to a location. Self installation is very appealing.

I have read other comments about the longevity of SpaceX. Early services such as Starband were available for about 5-7 years. HughesNet and DishNetwork are still available. But all technologies are fleeting. It is best to take advantage while they are here instead of talking about it. All in all, the technologies are changing and the Starlink system is what we need- NOW! I might add that many of the villages in Alaska still do not have basic running water and sewer. If Internet was direct to consumer and the Government was out of the Internet Service business, maybe that money could be used to improve sanitary conditions for its citizens.

SpaceX is willing, capable, and underway with launches. Starlink Beta testing shows the availability to the consumer or business of service that has only been available through Government funded monopoly.

Middle mile is not working for the little guy in Rural areas. Many of the comments I have read lead me to believe that the commenters are after the subsidies as well. The gold no longer lies in the "hills" but in those subsidies. This needs to end by allowing competition and service to bring service where it's needed. It would be a shame to have Greece have Starlink service before actual US Citizens, but that's about what's going to happen.

We need the availability of affordable service in Rural Alaska. ESPECIALLY during this time of Covid where students, businesses, and others are not able to travel or even leave their homes in many cases.

Lastly I want to offer one last example that I hope is the future of Internet Service to Remote Areas in Alaska. Before 2000, the State of Alaska provide a service called RATNET, or Rural Alaska Television Network. This service provided Television to most of Rural Alaska. In those days, KYUK, the television station for Southwest Alaska had a FCC exemption to allow this public station to transmit commercial programming. In those days, television was the primary source of information. As time went on, Dish Network and DirecTV became available and offered better service and more programming options. Consumers flocked to those services to the extent RATNET was no longer needed and for the most part Dish Network is the primary television service provider. Government was no longer necessary. We are at that same crossroads with regards to Internet. SpaceX is able to bring Internet service to our people and they are excited about the prospect. Government funded Internet won't be necessary once the service becomes operational.

I implore the commission to expedite the request to bring Internet service to rural Alaska and expand the present 10 satellites to whatever is necessary to allow Internet service for our people. Thank you for the first group, but please, let's get going with the full spectrum.

Thank You.

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