



PUBLIC NOTICE

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DA 24-551

Released: June 11, 2024

WIRELESS TELECOMMUNICATIONS BUREAU APPROVES BRISTOL BAY CELLULAR PARTNERSHIP'S, TELALASKA CELLULAR'S, AND WINDY CITY CELLULAR'S REVISED PERFORMANCE PLANS PURSUANT TO THE ALASKA PLAN

WC Docket No. 16-271

By this Public Notice, the Wireless Telecommunications Bureau (WTB) approves the revised performance plans of Bristol Bay Cellular Partnership (BBCP), TelAlaska Cellular, Inc. (TelAlaska), and Windy City Cellular (WCC), filed pursuant to the terms provided by the *Alaska Plan Order*.¹ The approved performance plans are included in the attached Appendix A.

The *Alaska Plan Order* requires eligible service providers participating in the Alaska Plan to submit for WTB approval individual performance plans with their service commitments.² WTB approved wireless service providers' initial performance plans in 2016.³ However, WTB "may require the filing of revised commitments at other times if justified by developments that occur after the approval of the initial performance commitments."⁴

Based on claims that BBCP,⁵ TelAlaska,⁶ and WCC⁷ made pursuant to their respective participation in the Secure and Trusted Communications Networks Reimbursement Program about

¹ *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139 (2016) (*Alaska Plan Order*).

² See 47 CFR § 54.317(f); *Alaska Plan Order*, 31 FCC Rcd at 10160, para. 67.

³ *Wireless Telecommunications Bureau Approves Performance Plans of the Eight Wireless Providers That Elected to Participate in the Alaska Plan*, Public Notice, 31 FCC Rcd 13317, Appx. A, Approved Performance Commitments (WTB 2016) (*Wireless Commitments Public Notice*) (approving BBCP's, WCC's, and six other mobile providers' initial performance plans); see also *Wireless Telecommunications Bureau Approves GCI's Revised Performance Plan Pursuant to the Alaska Plan Order*, WC Docket No. 16-271, Public Notice, 35 FCC Rcd 9539, 9539-41, Appx. (WTB 2020) (*GCI's Second Revised Performance Plan*) (accepting GCI's current performance plan); *Wireless Commitments Public Notice*, 31 FCC Rcd at 13321, Appx. A (providing CVW's current performance plan).

⁴ 47 CFR § 54.317(f).

⁵ See BBCP Supply Chain Replacement Plan Narrative via SCRP Portal (Jan. 14, 2022).

⁶ See TelAlaska Supply Chain Replacement Plan Narrative via SCRP Portal (Jan. 14, 2022).

⁷ See WCC Supply Chain Replacement Plan Narrative via SCRP Portal (Jan. 14, 2022).

improvements to their network,⁸ WTB contacted BBCP,⁹ TelAlaska,¹⁰ and WCC¹¹ about filing revised commitments to address these developments. In response, the three mobile-service providers filed revised performance plans.

BBCP's revised performance plan commits to provide a minimum of 10/2 Mbps to 5454 Alaskans—which is an expansion of coverage of commitments over the 4530 Alaskans it initially committed to cover with LTE¹²—and it also commits to covering an additional 1277 Alaskans with 25/15 Mbps 4G LTE.¹³ This is an improvement from the initial performance plan.

TelAlaska's revised performance plan improves the service offered for the majority of the Alaskans that it commits to cover. Specifically, it commits to upgrade many of its 2G and 3G areas to 4G LTE, and in the Nome, Alaska area, it commits to upgrade to 4G LTE at a minimum of 10/1 Mbps.¹⁴

WCC's revised performance plan improves the service offered from 2G at 200/200 kbps¹⁵ to 4G LTE at a minimum of 5/1 Mbps speeds where people live on Adak Island, Alaska.¹⁶ Although WCC's revised performance plan reduces its coverage commitment for the five- and ten-year mark, it reflects a vast improvement in technology and minimum expected download/upload speeds.¹⁷ We find the reduced population coverage commitments to be reasonable, given the substantial reduction of population on

⁸ See *Wireline Competition Bureau Announces the Grant of Applications For the Secure and Trusted Communications Networks Reimbursement Program*, WC Docket No. 18-89, Public Notice, 37 FCC Rcd 8590 (2022); *id.* at 8594 (announcing allocation to BBCP); *id.* at 8603 (announcing allocation to WCC), https://docs.fcc.gov/public/attachments/DA-22-774A1_Rcd.pdf; see also Secure and Trusted Communications Networks Act of 2019, Pub. L. No. 116-124, § 4(a)-(c), 134 Stat. 158 (2020) (codified as amended at 47 U.S.C. §§ 1601–09); *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, WC Docket No. 18-89, Second Report and Order, 35 FCC Rcd 14284, 14285, para. 2 (2020); *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, WC Docket No. 18-89, Third Report and Order, 36 FCC Rcd 11958, 11959, Appx. A (July 13, 2021).

⁹ Email from Matthew Warner, Attorney Advisor, WTB, to Earl Hubb, BBCP (Aug. 19, 2022 15:05 ET); Email from Matthew Warner, Attorney Advisor, WTB, to Earl Hubb, BBCP (Jan. 12, 2023 13:40 ET).

¹⁰ Email from Matthew Warner, Attorney Advisor, WTB, to Dave Goggins, TelAlaska (Aug. 19, 2022 15:01 ET); Email from Matthew Warner, Attorney Advisor, WTB, to John Walter, TelAlaska (Apr. 18, 2024 17:46 ET).

¹¹ Email from Matthew Warner, Attorney Advisor, WTB to Andilea Weaver, Vice President and COO, WCC (Sept. 14, 2022 13:23 ET).

¹² *Wireless Commitments Public Notice*, 31 FCC Rcd at 13320, Appx. A.

¹³ Letter from Earl Hubb, BBCP, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 16-271 (filed Mar. 31, 2023), Attach. (BBCP March 2023 Performance Proposal); Letter from Garnet Hanly, Chief, CIPD, FCC, to Earl Hubb, BBCP, at 6-9 (filed Aug. 3, 2023); Email from Steven Chernoff, Counsel for BBCP, to AK Plan (Sept. 6, 2023 9:50 ET); Email from Steven Chernoff, Counsel for BBCP, to AK Plan (Nov. 3, 2023 17:53 ET); Email from Steven Chernoff, Counsel for BBCP, to Matthew Warner, Attorney Advisor, WTB (Dec. 8, 2023 9:08 ET).

¹⁴ Email from John R. Walter, EVP, General Counsel and Secretary, Fastwyre Broadband, to Matthew Warner, Attorney Advisor, WTB (May 29, 2024 13:53 ET).

¹⁵ *Wireless Commitments Public Notice*, 31 FCC Rcd at 13323, Appx. A.

¹⁶ Email from Larry Mayes, President/CEO, Adak Telephone Utility, to AK Plan, FCC (Feb. 21, 2024 13:43 ET), Attach. (WCC Updated Performance Plan).

¹⁷ *Compare Windy City Cellular Revised Performance Plan*, Appx. A, *infra*, with *Wireless Commitments Public Notice*, 31 FCC Rcd at 13323, Appx. A.

Adak Island since the inception of the Alaska Plan.¹⁸ WCC's proposed coverage reductions have been caused by structural and other changes that occurred during the upgrade from 3G UMTS to 4G LTE,¹⁹ and WCC notes that none of these reductions in coverage affect where people actually reside or have business locations on Adak Island.²⁰ Because WCC will not be reducing any coverage in areas where people currently reside,²¹ and because it has committed to offer superior service than in its initial performance plan, we find the revised commitment to be in the public interest, and we accept the revised performance plan as an improvement for Alaskans on Adak Island.²²

The attached revised performance plans are improvements to the initial performance plans that will benefit Alaskans, are responsive to WTB's requests, and are hereby accepted as these providers' operative performance plans for the Alaska Plan.

Additional Information. For additional information on this proceeding, contact ak.plan@fcc.gov.

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¹⁸ Staff analysis indicates that there has been a substantial reduction in population on Adak Island since 2010. The population of Adak Island in the 2020 decennial census was 171, compared to 326 in 2010, or a decline of nearly 50 percent. *See* Census, Adak City, Alaska, https://data.census.gov/profile/Adak_city,_Alaska?g=160XX00US0200065. Analysis of WCC's coverage from December 31, 2021 showed that it was covering 289 people of the 325 it committed to serve. Further analysis indicates that the uncovered portion does not have any broadband serviceable locations.

¹⁹ *See* Letter from Larry D. Mayes, President and CEO, Adak Eagle Enterprises, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 16-271, Quarterly Report (Feb. 1, 2024) (WCC Feb. 2024 Quarterly Report) ("WCC uses two sites to provide mobile wireless coverage on Adak Island. One of these sites required a new tower at a new location with lower antenna centerlines that is unable to overcome certain terrain obstructions in WCC's required service area. WCC's network redesign, along with the change in technology and propagation characteristics, results in a reduced overall coverage footprint . . ."); Email from Larry D. Mayes, President and CEO, Adak Eagle Enterprises, to AK Plan (Apr. 4, 2024 5:52 ET) ("There are differences between the new 4G LTE network and the legacy 3G UMTS network that it is replacing. While everything possible was done to match the service area coverage of the 3G network, the final implementation of the 4G network required some different equipment locations and lower antenna centerlines that result in a predicted reduction in coverage overlap with the AK Population-Distribution Model. Additionally, the change from UMTS to LTE is expected to result in some reduction in area coverage due to power spectral density changes and the 4G LTE technology propagation modeling. It is important to recognize that testing of the new 4G network shows that there is no reduction in service coverage to the existing, real-world population on Adak Island. One hundred percent of the inhabited residential and business locations and primary roadways remain covered under the revised 4G LTE network design. All of the areas that remain unserved have been verified to be uninhabitable and vacant.").

²⁰ WCC Feb. 2024 Quarterly Report ("It is important to note that testing of the new 4G LTE networks shows that there is not reduction in service coverage to the current, actual population on Adak Island. One hundred percent of the inhabited residential and business locations and primary roadways remain covered under the revised 4G LTE network design. All of the areas that will remain unserved have been verified to be uninhabitable and vacant.").

²¹ WCC is covering all areas of the Alaska Population Distribution Model on Adak Island, except for one portion in the southern part of Adak Island. In that portion, there are no broadband serviceable locations, suggesting people do not live or work in the uncovered area.

²² *Compare Wireless Commitments Public Notice*, 31 FCC Rcd, Appx. A at 13323 (publicizing WCC's commitment to provide 200/200 kbps GSM mobile service to 325 people, based on 2010 census data, at the 5- and 10-year mark); *with* WCC Updated Performance Plan (offering to cover 289 people with 3G at 500/500 kbps at the 5-year mark and 239 people with 4G LTE at 5/1 Mbps).

**Appendix A:
BBCP, TelAlaska, and WCC Revised Performance Plans**

Bristol Bay Cellular Partnership

Bristol Bay Cellular Partnership - Revised Performance Plan w/ Alternative 10 Year Milestone (November 3, 2023)

Middle Mile Facility	Note 1		Note 2		Technology of Transmission (477 Code)	Minimum Expected Download/ Upload Speeds	Note 3		Technology of Transmission (477 Code)	Minimum Expected Download/ Upload Speeds	Note 4		Technology of Transmission (477 Code)	Minimum Expected Download/ Upload Speeds
	Population 2010 Census	Spectrum Codes (477 Code)	Population Served 12/31/15	% Base Population Served 12/31/15			5 Year Base Population Served	5 Year % Total Population Served			10 Year Base Population Served	10 Year % Total Population Served		
Satellite										4 Mbps/ 1 Mbps	5454	100%	83	10 Mbps/ 2Mbps
Microwave	4530	91	4530		86	N/A	4530	100%	83		177	100%	83	25 Mbps/ 15 Mbps
Fiber											1100	100%	83	25 Mbps/ 15 Mbps

Note 1: Population per 2010 Census in service area. Excludes population served by AT&T and/or Verizon at 4G LTE using their infrastructure.
 Note 2: Percentage of population able to be served at benchmark speeds as of 12/31/2015
 Note 3: Year 1 is 2017
 Note 4: The increase in base population served is due to Bristol Bay's plan to build fiber to serve Port Heiden, which is 50 miles south of Bristol Bay's southernmost boundary.

Note 4: BBCP will increase base population by expanding network coverage to communities adjacent to current serving areas and will utilize LEO and microwave for middle mile transport. The intent is to provide 4G LTE service to underserved communities as well as improving our service offering by expanding coverage. Initial BBCP expansion plan includes Bristol Bay Alaska regional communities of Port Heiden, Manakotak, Togiak and Twin Hills.

TelAlaska Cellular

Middle Mile	Population 2010 Census	Spectrum Codes (477 Code)	TelAlaska Cellular, Inc. - Alaska Plan Commitments								Note 3		Technology of Transmission (477 Code)	Minimum Expected Download/ Upload Speeds	
			Population Served 12/31/14	% Base Population Served 12/31/14	Technology of Transmission (477 Code)	Minimum Expected Download/ Upload Speeds	5 Year Base Population Served 2022	5 Year % Total Population Served 2022	10 Year Base Population Served 2027	10 Year % Total Population Served 2027					
Satellite	15198	91	11702	77%	86	256Kbps/ 256Kbps	6079	40%	86	256Kbps/ 256Kbps	1663	11%	86	256Kbps/ 256Kbps	
		91	2888	19%	80	1.0Mbps/ 128 Kbps	4863	32%	80	1.0Mbps/ 128 Kbps	0	0%	80	1.0Mbps/ 128 Kbps	
		91					1.0Mbps/ 128 Kbps	3800	25%	83	1.0Mbps/ 128 Kbps	9937	65%	83	1.0Mbps/ 128 Kbps
Fiber											3598	24%	83	10.0Mbps/ 1.0 Mbps	
			14590									15198			

Note 1: Nome is the only location where TCI currently has a commercially viable opportunity to provide fiber middle mile. The remaining areas remain under review but are not currently affordable.
 Note 2: All population figures are based on 2010 census data. The 2020 census data provides for a 4.4% drop in population by comparison.
 Note 3: The estimates proposed are based on anticipated upgrades under the SCRPP, but are subject to contingency based on underfunding, construction risk, reimbursement risk and cost overruns.

Windy City Cellular

WINDY CITY CELLULAR ALASKA PLAN

Middle Mile	Note 1		Note 2		Technology of Transmission (477 Code)	Minimum Expected Upload / Download Speeds	5-Year Base Population Served	5-Year % Total Population Served	Technology of Transmission (477 Code)	Minimum Expected Upload / Download Speeds	10-Year Base Population Served	10-Year % Total Population Served	Technology of Transmission (477 Code)	Minimum Expected Upload / Download Speeds
	Population (2010 Census)	Spectrum Codes (477 Code)	Population Served (12/31/2015)	% Base Population Served (12/31/2015)										
Satellite	326	91	326	100%	86	200k/200k	289	89%	86	500k/500k	239	73%	83	5/1Mbps

Note 1: Population per 2010 Census in service area. Excludes population served by AT&T and/or Verizon at 4G LTE using their infrastructure.
 Note 2: Percentage of population served at benchmark speeds as of 12/31/2015
 Note 3: Year 1 is 2017.

**Appendix B:
Technology Codes for Alaska Plan Performance Plans**

Technology Code	Description
80	Terrestrial Mobile Wireless – WCDMA/UMTS/HSPA
81	Terrestrial Mobile Wireless – HSPA+
82	Terrestrial Mobile Wireless – EVDO/EVDO Rev A
83	Terrestrial Mobile Wireless – LTE
84	Terrestrial Mobile Wireless – WiMAX
85	Terrestrial Mobile Wireless – CDMA
86	Terrestrial Mobile Wireless – GSM
87	Terrestrial Mobile Wireless – Analog
88	Terrestrial Mobile Wireless – Other

*5G-NR should be listed at “5G”