

November 19, 2012

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Applications of GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. for Consent to the Assignment of Licenses to Alaska Wireless Network, LLC, WT Docket 12-187, WC Docket 09-197 – Notice of *Ex Parte* Communication

Dear Ms. Dortch:

On Thursday, November 15, 2012, Leonard Steinberg and Richard Cameron of Alaska Communications Systems Group, Inc. (“ACS”) and I, on behalf of ACS and its operating subsidiaries ACS Wireless License Sub, Inc. and ACS of Anchorage License Sub, Inc. (the “ACS Applicants”), met with Commissioner McDowell and Christine Kurth to discuss the pending Assignment of License applications and the associated Petition for Declaratory Ruling in the above-captioned dockets.

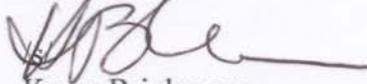
In the meeting, ACS summarized the structure of the proposed Alaska Wireless Network (“AWN”) joint venture transaction that is the subject of the above-referenced applications and Petition for Declaratory Ruling. ACS described how grant of the Petition is a necessary prerequisite to the parties’ closing of the AWN transaction. ACS described the competitive landscape for mobile voice and broadband services in Alaska, and pointed out that eligibility for universal service support will continue to be essential to providing advanced mobile voice and broadband services in high-cost rural areas in Alaska, and to low-income customers in the state. The requested declaratory rulings will help ACS ensure that it can comply with current requirements under the Communications Act and the Commission’s rules, as well as meet the future needs of rural Alaskans.

The substance of the points presented by ACS may be found in the pending Applications and Petition for Declaratory Ruling in the above-captioned dockets.

Marlene H. Dortch, Secretary
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Please direct any questions regarding this matter to me.

Very truly yours,



Karen Brinkmann

*Counsel to Alaska Communications Systems
Group, Inc., ACS Wireless License Sub, Inc., and
ACS of Anchorage License Sub, Inc.*

cc: Christine Kurth
Robert McDowell