

**REDACTED – FOR PUBLIC INSPECTION**

November 27, 2012

VIA HAND DELIVERY

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 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 No. 12-187

Dear Ms. Dortch:

On behalf of ACS Wireless License Sub, Inc. and ACS of Anchorage License Sub, Inc. (collectively "ACS"), the enclosed materials are responsive to certain of the October 11, 2012 request for information and clarification in the above-referenced proceeding (the "October 11 Letter").<sup>1</sup>

The documents contained on the enclosed CD-ROM disc respond to document request number 11. In accordance with the October 11 Letter, the CD-ROM disc, which includes Summation load files, is identified as submitted by ACS, the production volume is sequentially numbered ACSFCC002-001 to follow previous volumes of documents submitted, and the individual images are sequentially numbered ACS\_FCC000000047 through ACS\_FCC000000056 to follow previous submissions of images. The production index and a privilege log associated with the documents reviewed for this document request number 11 are provided electronically on a separate CD-ROM disc.

Document request number 11 states:

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<sup>1</sup> Letter from Ruth Milkman, Chief, Wireless Telecommunications Bureau, to Lisa Phillips, ACS Wireless, WT Docket No. 12-187, Oct. 11, 2012.

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
November 27, 2012  
Page 2 of 3

- 11. The Applicants at page 15 of the Public Interest Statement claim that “[t]he infrastructure-sharing arrangement is critical to the ability of ACS Wireless and GCI to remain competitive in Alaska in the face of recent and future reductions in high-cost universal service support...” Provide all documents discussing the effects the reduction in high-cost universal service would have on the ability of the Company to provide mobile wireless services absent the Proposed Transaction.**

ACS Response:

ACS encloses two documents responding to this request. These documents are forecasts of the expected decrease in high-cost Universal Service support for ACS Wireless as a Competitive Eligible Telecommunications Carrier (“CETC”) from July 2012 through June 2018.

**[REDACTED]**

The documents provided in this submission are Highly Confidential to ACS and therefore are being provided under seal pursuant to the Commission’s Second Protective Order in this docket. All materials included in the enclosed CD-ROM disc are designated as “Highly Confidential” in their entirety. The disc is marked, “HIGHLY CONFIDENTIAL – SUBJECT TO SECOND PROTECTIVE ORDER IN WT DOCKET NO. 12-187 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION,” according to the requirements of the Second Protective Order.

ACS has made diligent efforts to ensure that none of the documents it is submitting here is privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged documents may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. ACS requests that any privileged documents

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
November 27, 2012  
Page 3 of 3

inadvertently produced be returned to ACS as soon as such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such documents.

Please contact me should any questions arise concerning this filing.

Respectfully submitted,

/s/

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*Counsel for ACS*

cc: Kathy Harris, Wireless Telecommunications Bureau