

REDACTED – FOR PUBLIC INSPECTION

December 4, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th 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”).¹

The enclosed CD-ROM disc responds to document request number 19. In accordance with the October 11 Letter, the disc, which includes Summation load files, is identified as submitted by ACS, the production volume is sequentially numbered ACSFCC0004 to follow previous volumes of documents submitted, and the individual images are sequentially numbered ACS_FCC000000061 through ACS000000146 to follow previous submissions of images. The production index associated with the enclosed documents is provided electronically on a separate CD-ROM disc.

Document request number 19 states:

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

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
Federal Communications Commission
December 4, 2012
Page 2 of 4

- 19. Provide the following maps as of the date of this Request. Provide the maps in a geo-referenced format, such as a shapefile (for ArcMap) or table (for MapInfo). Provide all assumptions, methodology (e.g., propagation, field measurements), calculations (including link budgets), tools (e.g., predictive and field measurements) and data (e.g., terrain, morphology, buildings) that are used to produce the maps.**
- a. by bands of the geographic coverage of each relevant wireless service provided by the Company, distinguishing by technological format (e.g., GSM, EDGE, UMTS, HSPA, HSPA+, LTE, CDMA, EV-DO, EV-DO Rev. A). On these coverage maps: (1) depict in separate colors two ranges of signal levels (-95 to -85 dBm, and greater than -85 dBm); (2) depict all major and minor roads; and (3) indicate locations of their cell sites (color coded with frequency band);**
 - b. earth station locations, submarine cables (including landing sites), fixed wireless networks;**
 - c. wireline service areas'**
 - d. areas where the Company offers a bundled product; and**
 - e. the path of any lit or unlit fiber.**

ACS Response:

ACS responds to each of the above requests for maps as follows:

- a. ACS has two maps that are publicly available on its website demonstrating geographic coverage for wireless services offered using LTE and CDMA. Both maps can be accessed at this link: <http://www.alaskacomunications.com/Online-Care/Service-Coverage.aspx>. The geographic coverage for LTE technology can be accessed by clicking on the 4G LTE Phones tab and the geographic coverage for the CDMA technology can be accessed by clicking on the 3G Phones tab. On both maps it is possible to zoom in to the street level using the + button. These maps do not show cell sites, but these maps show the aggregate coverage available from all nearby cell sites.
[REDACTED]

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
Federal Communications Commission
December 4, 2012
Page 3 of 4

Some, but not all, of the maps that the Commission has on its website for the ACS licenses involved in the transaction also demonstrate roads and cell sites. ACS is not attaching those maps as they are already in the public record. A printed page from the referenced link that responds to this request is included as a responsive document.

b. **[REDACTED]**

ACS encloses a map demonstrating its two submarine cables, named Northstar and Akorn.
[REDACTED]

c. ACS encloses maps that are publicly available on file with the Regulatory Commission of Alaska demonstrating the company's wireline service areas.

d. **[REDACTED]**

e. ACS encloses a map demonstrating its fiber paths, which include lit fiber and may include unlit fiber.

The information marked Highly Confidential in this letter is 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. The documents provided in

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
Federal Communications Commission
December 4, 2012
Page 4 of 4

response to document request number 19 that are publicly available can be accessed publicly via the Company's website or at the Regulatory Commission of Alaska and therefore are not being filed publicly with the Commission.

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 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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cc: Kathy Harris, Wireless Telecommunications Bureau