



Federal Communications Commission
Washington, D.C. 20554

December 21, 2012

Via e-mail

Tamara L. Preiss
Verizon
1300 I Street, NW
Suite 400 West
Washington, DC 20005

Re: Request for Information Concerning Applications of GCI Communication Corp. and ACS License Sub Inc., ACS of Anchorage License Sub, Inc., and UNICOM, Inc., Assignment of Licenses to The Alaska Wireless Network, LLC (WT Docket 12-187)

Dear Ms. Preiss:

On June 18, 2012, GCI Communication Corp. ("GCI"), its wholly-owned subsidiary Unicom, Inc., and ACS Wireless License Sub, Inc. and ACS of Anchorage License Sub, Inc. (together, the "Applicants"), filed four separate applications pursuant to Section 310(d) of the Communications Act of 1934, as amended (the "Act"),¹ seeking consent to assign spectrum licenses to a newly formed wholly-owned subsidiary of GCI Wireless Holdings, LLC,² The Alaska Wireless Network, LLC ("AWN"). In order for the Commission to complete its review of the applications and make the necessary public interest findings under the Act, we require written responses and supporting documentation, as applicable, for each request set forth in the Attachments from Verizon Wireless, as an entity against which the Applicants may compete.

Accordingly, pursuant to sections 4(i), 4(j), and 403 of the Act,³ we request that you provide written responses as set forth in the Attachments. Each response or document should clearly indicate the specific question or request to which it responds, and each page should be marked with a corporate identification and consecutive document control numbers as specified in the attached instructions. Your response will be treated as Highly Confidential pursuant to the Protective Orders issued in WT Docket No. 12-187.⁴ We would appreciate receiving your response no later than January 11, 2013.

Sincerely,

Ruth Milkman, Chief
Wireless Telecommunications Bureau

¹ 47 U.S.C. § 310(d).

² GCI Wireless Holdings, LLC is a wholly-owned subsidiary of GCI.

³ 47 U.S.C. §§ 154(i), 154(j), 403. *See generally FCC v. Schreiber*, 381 U.S. 279 (1965).

⁴ Applications of GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. For Consent To Assign Licenses to The Alaska Wireless Network, LLC, WT Docket No. 12-187, *Protective Order*, DA 12-1061 (rel. July 3, 2012); Applications of GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. For Consent To Assign Licenses to The Alaska Wireless Network, LLC, WT Docket No. 12-187, *Second Protective Order*, DA 12-1060 (rel. July 3, 2012).

WT Docket Number 12-187
INFORMATION AND DISCOVERY REQUEST FOR
Verizon Wireless

1. Describe in detail whether the Company offers or has any plans to offer any Relevant Wireless Product or Relevant Wireless Service in the Relevant Area. If the Company has entered or plans to enter the Relevant Area, provide a timeline detailing the timing and location, by census area and type of Relevant Wireless Product or Relevant Wireless Service offered or to be offered, of the Company's entry into the Relevant Area. Provide documents/marketing plans/projections/technology plans/presentations sufficient to demonstrate in as much detail as exists the Company's current or planned entry, or its decision not to enter into the Relevant Area.

2. Describe whether the Company has attempted to negotiate, is currently negotiating, has plans to negotiate, or has obtained a roaming agreement from any mobile wireless service provider for any Relevant Wireless Service in the Relevant Area. Submit one complete copy of each agreement and any attachments, exhibits or amendments thereto, whether formal or informal, or letter of understanding and all documents relating to negotiation of any agreement. Explain and provide documents sufficient to demonstrate whether the Company's entry into the Relevant Area is impacted in any way by voice or data roaming.

Definitions

In this Information and Document Request, the following terms shall have the following meanings (such meanings to be equally applicable to both the singular and plural forms of the terms defined):

1. The terms “Company” or “Verizon” means Cellco Partnership d/b/a Verizon Wireless, its parents, predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures, and all directors, officers, employees, agents, and representatives of the foregoing. The terms “parent”, “subsidiary”, “affiliate”, and “joint venture” refer to any person in which there is partial (10 percent or more) or total ownership or control between the company and any other person.
2. The terms “and” and “or” have both conjunctive and disjunctive meanings.
3. The word “any” shall be construed to include the word “all,” and the word “all” shall be construed to include the word “any.” The word “each” shall be construed to include the word “every,” and the word “every” shall be construed to include the word “each.” All words used in the singular should be construed to include the plural, and all words used in the plural should be construed to include the singular.
4. The term “documents” means all computer files and written, recorded, and graphic materials of every kind in the possession, custody, or control of the Company. The term “documents” includes without limitation drafts of documents, copies of documents that are not identical duplicates of the originals, and copies of documents the originals of which are not in the possession, custody, or control of the Company. The term “documents” includes, without limitation, materials of every kind in the possession, custody, or control of the Company whether created internally or externally. In addition, the term “documents” includes without limitation any amendments, side letters, appendices, or attachments. The term “computer files” includes without limitation information stored in, or accessible through, computer or other information retrieval systems. Thus, the Company should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, mainframes, servers, backup disks and tapes and archive disks and tapes, and other forms of offline storage, whether on or off the Company’s premises. Electronic mail messages should also be provided, even if only available on backup or archive tapes or disks. Computer files shall be printed and produced in hard copy or produced in machine-readable form (provided that Commission staff determine prior to submission that it would be in a format that allows the Commission to use the computer files), together with instruction and all other materials necessary to use or interpret the data. Unless otherwise specified, the term “documents” excludes bills of lading, invoices, purchase orders, customs declarations, and other similar documents of a purely transactional nature and also excludes architectural plans and engineering blueprints. Where more than one identical copy of a requested document exists, the Company shall only submit one representative copy.
5. The term “Person” includes the Company, and means any individual, partnership, corporation (including a business trust), joint stock company, trust, unincorporated association, joint venture, Limited Liability Company or other entity, or a government or any political subdivision or agency thereof.
6. The term “plans” means tentative and preliminary proposals, recommendations, or considerations, whether or not finalized or authorized, as well as those that have been adopted.

7. The term “relating to” means in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying, or stating.
8. The term “Relevant Area” means, and information must be provided separately for, each Cellular Market Area in the state of Alaska, and the State of Alaska as a whole.
9. The term “Relevant Wireless Product” means, and information must be provided separately for, any of the mobile wireless services and using any of the following formats: CDMA, EV-DO, EV-DO Rev. A, LTE, GSM, EDGE, UMTS only, HSPA, and HSPA+:
 - 1) feature mobile devices: wireless handset devices that are cable of supporting voice services as well as text services;
 - 2) smartphones: wireless handset devices other than iPhones, with advanced computing capability and connectivity sufficient to run complete mobile operating system software (e.g., Android, Research in Motion Ltd. Blackberry, Windows phone) to support all mobile wireless services, including broadband data and video applications as well as voice, photographic cinematic, and audio-visual media player services (including books, periodicals, movies, music, games);
 - 3) iPhones: smartphones designed and marketed by Apple Inc.;
 - 4) tablet PCs (includes netbook PCs): portable devices (other than iPads) with touch screen and/or a QWERTY keyboard input, and advanced computing capability and connectivity sufficient to run complete operating system software (e.g., Android, Windows) to support broadband data and video applications as well as photographic, cinematic, and audio-visual media player services (including books, periodicals, movies, music, games);
 - 5) iPads: tablet PCs designed by Apple Inc.;
 - 6) e-readers: portable personal computing devices with a display size of 6" to 10" typically, with advanced computing capability and connectivity sufficient to enable users to shop for, purchase, download, and display text, designed primarily for the purpose of reading books, newspapers, and periodicals;
 - 7) “air cards” (also referred to as “laptop cards”): portable wireless modems that enable personal computing devices to connect to a mobile wireless network in order to support and deliver voice, data, and video services;
 - 8) mobile hotspots devices: network routing devices that enable portable, Wi-Fi enabled handset and personal computing devices to connect to a mobile wireless network in order to support and deliver voice, data, and video services; and
 - 9) other mobile wireless devices not listed above. Describe the other devices included in this category.
10. The term “Relevant Wireless Service means, and information must be provided separately for, any of the services identified below and using any of the following formats: CDMA, EVDO, EVDO Rev. A, LTE, GSM, EDGE, UMTS only, HSPA, and HSPA+:
 - 1) mobile wireless voice services;
 - 2) mobile wireless text services;
 - 3) mobile wireless data services;
 - 4) mobile wireless applications; and
 - 5) fixed wireless services.

Instructions

1. Unless otherwise specified, all Information and Document Requests cover the period from January 1, 2010 through the present.
2. Corporations and other entities, including affiliated or subsidiary entities, shall be identified by the Central Index Key (“CIK”) assigned by the Securities and Exchange Commission (“SEC”). A unique identifier should be used for each entity that has not been assigned a CIK by the SEC.
3. Submit responses to Information Requests in both paper and electronic form, unless an electronic form is specified (*e.g.*, electronic spreadsheet). Submit responses to Document Requests (including materials containing Highly Confidential or Confidential Information) in electronic form only in a manner that is fully compatible with the Commission’s Summation Enterprise software database, as set forth in the Instructions for Submission of Electronic Documents. The Commission does not require the submission of paper copies of these documents at this time, but reserves the right to require their submission at a later time.
4. Each requested document shall be submitted in its entirety, even if only a portion of that document is responsive to a request made herein. This means that the document shall not be edited, cut, or expunged, and shall include all appendices, tables, or other attachments, and all other documents referred to in the document or attachments. All written materials necessary to understand any document responsive to these requests shall also be submitted. Provide final versions of each document; however, if a final version does not exist provide one copy of the latest draft of the document.
5. Unless otherwise agreed to by the Commission, requests for the production of documents (and any particular type of document) require the production of all responsive documents in the possession, custody, or control of the Company.
6. For each document or statement submitted in response to the requests, indicate by number the request to which it is responsive and, for documents, identify the Person(s) from whose files the document was retrieved (*i.e.*, custodian). If any document is not dated, if known, state the date on which it was prepared. If any document does not identify its author(s) or recipient(s), provide, if known, the name(s) of the author(s) or recipient(s) as metadata in accordance with Instructions for Submission of Electronic Documents.
7. The specific requests made herein are continuing in nature. The Company is required to produce in the future any and all documents and information that are responsive to the requests made herein but not initially produced at the time, date, and place specified herein. In this regard, the Company must supplement its responses (a) if the Company learns that, in some material respect, the documents and information initially disclosed were incomplete or incorrect or (b) if additional responsive documents or information are acquired by or become known to the Company after the initial production.

Instructions for Submission of Electronic Documents

A. Form of Production

1. Electronic documents shall be produced in Summation Enterprise load files as images and/or native format files with extracted text and related metadata and bibliographic information. A list of metadata fields that must be populated, as relevant, is attached. Specific requirements for different types of documents are discussed below. Please contact Commission staff for further technical specifications, including the image and text file specifications and the load file configuration, and for a sample load file set.
2. Each Summation submission must be on a physical media, either a portable hard drive or DVD-ROM.
3. Each physical media provided must have a label affixed. The label shall state: (a) the name of the party submitting the data, (b) the date of the submission, (c) the volume number of production (see below), and (d) the range of documents contained on the media.
4. Each Summation submission must have a volume number associated with it. On the root of the media, the top-level folder must be named for the volume. This volume number should also be indicated on the physical label of the media. The volume naming scheme should start with a 2 or 3 letter prefix (identifying your company) followed by a 3-digit counter (e.g., ABC001). Load file volumes may not contain more than 25,000 records each (but multiple file volumes may be included on one hard drive).
5. Under the volume folder, the production should be organized in 3 subfolders:
 - a) IMAGES (may contain subfolders, with no more than 5,000 image files per folder) and FULLTEXT (may contain subfolders, with document-level text files). No file may be more than 25 megabytes.
 - b) DOCLINK (documents in native format, including all spreadsheets and presentations)
 - c) LOADFILES (the metadata, EDII, and LST information should be contained in one file, and the custodian append information in a separate file)
6. Each submission shall be accompanied by a spreadsheet (production index), in hard copy and electronic form, detailing what has been produced, by custodian and document identification number, and containing statistical information about each volume.
7. If a password is used, the same password must be used for all submissions. If encryption is used, only Truecrypt software may be used.

B. Document Types

1. Hard-copy (or paper) documents.
 - (a) Except as otherwise agreed, hard-copy documents shall be produced as image files with related searchable OCR text and bibliographic information.
 - (b) Some documents may more appropriately and efficiently be produced in hard-copy form (e.g., maps).
 - (c) Special care should be taken to properly unitize documents, maintain attachment relationships, and indicate file folder or binder labels, consistent with the Definitions and Instructions.

2. E-mail and Other Electronic Messages.
 - (a) E-mail and other electronic messages (*e.g.*, instant messages (“IMs”)) shall be produced as image files with related searchable text and metadata and bibliographic information.
 - (b) Each IM conversation shall be produced as one document.
 - (c) E-mail metadata shall include the folderpath (“folder” field) information for e-mail file folders into which a custodian’s e-mail messages have been organized. Be sure to preserve and produce this information as specified. Beware of copying e-mails into an electronic repository or forwarding them to a central e-mail box, as such processes may destroy this information. *See also infra* Section C(2) regarding custodian metadata.
 - (d) Depending on how the Company’s systems represent names in e-mail messages or IMs, the Commission may require a table of names or contact lists.
3. Spreadsheets shall be produced in native format (*e.g.*, .XLS files) with the first page imaged and with related searchable text and metadata and bibliographic information.
4. Presentations.
 - (a) Presentations shall be produced as images that show the full slide images and speaker notes, with related searchable text and metadata and bibliographic information.
 - (b) Presentations shall also be produced in native format (*e.g.*, .PPT files).
5. Word processing and other electronic documents not specifically addressed elsewhere in this letter shall be produced as image files with related searchable text and metadata and bibliographic information.
6. Embedded files with no substantive content (*e.g.*, corporate logos, executive “head-shot” photographs, stationery address blocks), which would appear in the production as an otherwise blank and therefore unresponsive “TIFF” image, should not be produced.

C. General Issues

1. Attachments and their parent documents are a “family” of documents. Families of documents (*e.g.*, a cover e-mail with multiple attachments) must all be produced in full. If one member of the family is responsive, the entire family is considered responsive, and individual documents in the family cannot be withheld on grounds of being “non-responsive.”
2. The required metadata for each electronic document includes “custodian” information (typically, the name of the human person from whose files the document was gathered) and “filepath” information for directory/server folders into which a custodian’s documents have been organized. Ensure that this information is collected when collecting responsive documents. If the Company stores documents in a repository that does not maintain personal custodian or filepath information (*e.g.*, that “journals” e-mails), it shall be required to stipulate to custodian identities for purposes of using documents.

3. In certain circumstances, a custodian may be a shared resource (*e.g.*, shared drive or server, shared filing cabinet). Materials gathered from such repositories, to which multiple people have access, shall be produced as separate custodians. The Company shall provide a brief description of each shared resource that includes a list of the employees who have access to that shared resource. The documents in shared resources should otherwise be produced as described in the rest of this letter. (Personal share or server drives are not shared resources and shall be produced as part of each human custodian's files.)
4. Native Format Files
 - (a) If any native files will be produced that cannot be viewed using the standard configuration of Microsoft Office 2007, Adobe Acrobat Reader 9, WordPerfect X4, or Internet Explorer 7, you will need to notify the Commission so it can determine whether it has the appropriate software and licenses to view those files. If it does not, it may be necessary for the Company to provide that software.
 - (b) Any encryption or password protection shall be removed from all native format files produced.
5. Images and Text Files
 - (a) Images of the produced electronic documents shall conform with any further specifications provided by the Commission.
 - (b) Searchable OCR and extracted text from the produced electronic documents shall conform with any further specifications provided by the Commission.
 - (c) Care should be taken to ensure that the text files will properly format and wrap.
 - (d) If any document cannot be interpreted in image/text format (*e.g.*, color, Microsoft Project), the Commission may request that it be produced natively, or the Company can contact the Commission to discuss producing them natively. As noted above in C(4)(a), the Company may need to provide the appropriate software in order for the Commission to view these documents.
6. Document Identification Numbering
 - (a) A consistent format for document identification numbering shall be used across the entire production. Document identification numbers should contain no more than three segments – *e.g.*, a company identifier, a middle segment (*e.g.*, custodian identifier), and a sequence of 6-8 digits (the number of digits should be consistent across the entire production).
 - (b) Document identification numbers should not contain embedded spaces (“ ”), slashes (“/”), backslashes (“\”), or underscores (“_”). Document identification numbers may contain hyphens (“-”).
 - (c) Native format files should be assigned a document identification number; if images have been produced with a native format file, the beginning document identification number of the images should be the native format file's document identification number.
7. In order to ensure the Company's full technical and procedural compliance with these instructions, the Company shall make its Information Technology personnel and those of its vendors available to Commission staff for consultation and coordination before, during, and after its production of materials responsive to the requests.

D. Sample Submission Prior to Full Production

In consultation with Commission staff, the Company may submit a test submission to ensure proper configuration of data for uploading into the Commission’s Summation Enterprise database server before the Company “ramps up” production. To minimize the likelihood of encountering problems during full production, the sample must be representative of an actual production, including multiple types of documents, documents with attachments (“families”), document families from which an item has been removed pursuant to privilege (and replaced with a document identification -numbered, placeholder image), redacted documents with appropriately related searchable text, and presentation documents with speaker notes.

FIELD LISTING FOR SUMMATION METADATA LOAD FILE			TYPE OF RECORD(S) TO WHICH EACH FIELD APPLIES			
Field Name	Field Description	Field Type	Hard Copy	E-Mail	Spreadsheets and Presentations	Other E-Docs (all Attachments, Calendar Appts, Loose Files)
SUBMISSION#	Production volume number (e.g., ABC001)	Note Text	x	x	x	x
REQUEST#	Request(s) to which the document is responsive	Multi-Entry	x	x	x	x
BEGDOC#	Start Bates (including prefix) -- do not use commas, underscores, ampersands, slashes, spaces, characters not allowed in Windows file names or any character used as a delimiter in the load files as part of this number	Note Text	x	x	x	x
ENDDOC#	End Bates (including prefix) -- do not use commas, underscores, ampersands, slashes, spaces, characters not allowed in Windows file names, or any character used as a delimiter in the load file as part of this number	Note Text	x	x	x	x
EPROPERTIES	Indicate All That Apply : <u>Record Type</u> : Loose File, E-mail, Attachment, Hard Copy, Calendar Appt <u>Privilege Notations</u> : Redacted, Privileged, Family Member of Priv Doc	Multi-Entry	x	x	x	x
PRIV	Privileged (Y/N)	Note Text	x	x	x	x
PO1	Subject to First Protective Order (Y/N)	Note Text	x	x	x	x
PO2	Subject to Second Protective Order (Y/N)	Note Text	x	x	x	x
DATEAPPTSTART	Start date of calendar appointment - YYYYMMDD	Date				x
TIMEAPPTSTART	Start time of calendar appointment - HH:MM am/pm	Time				x

FOLDER	E-mail folder path (sample: Inbox\Active); or Hard Copy folder/binder title/label	Note Text	x	x		
---------------	---	-----------	---	---	--	--