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January 29, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

Pursuant to Sections 1.774 and 69.701 *et seq.* of the Commission's rules, 47 C.F.R. §§ 1.774, 69.701 *et seq.*, ACS of Anchorage, Inc., ACS of Alaska, Inc., and ACS of Fairbanks, Inc. (collectively, the "ACS LECs") hereby submit the enclosed Petition for Phase II Pricing Flexibility ("Petition"). Pursuant to Section 0.459(b) of the Commission's rules, the ACS LECs request confidential treatment of certain portions of the Petition. In support of this request, the ACS LECs state as follows:

- (1) **Identification of the specific information for which confidential treatment is sought.** The ACS LECs request that the Commission afford confidential treatment to certain portions of Attachment B and D. These portions are redacted in the "public" version of this filing.
- (2) **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.** The information for which confidential treatment is sought is being submitted in conjunction with the ACS LECs' Petition for Phase II Pricing Flexibility, which is enclosed with this letter. The Petition is submitted in accordance with 47 C.F.R. §§ 1.774 and 69.701 *et seq.* of the Commissions rules.
- (3) **Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.** The information for which confidential treatment is sought is highly sensitive data regarding the ACS LECs' revenues and operations. Public disclosure of this information could place the ACS LECs at a competitive disadvantage vis-à-vis their competitors, and damage the ACS LECs' position in the marketplace. The Commission has recognized that competitive harm can result from the disclosure of confidential business information that gives competitors insight into a company's costs, pricing plans, market strategies, and consumer identities. *See Pan American Satellite Corporation*, FOIA Control Nos. 85-219, 86-38, 86-41 (May, 2 1986).

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- (4) **Explanation of the degree to which the information concerns a service that is subject to competition.** The information for which confidential treatment is sought concerns dedicated transport, special access, and channel termination services provided by the ACS LECs. The market for these services is subject to competition. Indeed, this filing itself demonstrates that competitive local exchange carriers ("CLECs") have collocated with the ACS LECs' facilities and provide competing services.
- (5) **Explanation of how disclosure of the information could result in substantial competitive harm.** A number of CLECs compete with the ACS LECs in the market for dedicated transport, special access, and channel termination services. If the information for which confidential treatment is sought were disclosed, these CLECs would be able to access sensitive and confidential revenue information regarding operations at the ACS LECs' wire centers, which could be used to target certain wire centers for collocation. Disclosing this information would give the ACS LECs' competitors an unfair and unwarranted advantage competing vis-à-vis the ACS LECs.
- (6) **Identification of any measures taken by the submitting party to prevent unauthorized disclosure.** The information for which confidential treatment is sought is not normally distributed, circulated, or provided to any party outside of the ACS LECs. The companies treat this information as sensitive information; thus only specialized personnel have access to it.
- (7) **Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.** The information for which confidential treatment is sought is not available to the public, and has not previously been disclosed to third parties.
- (8) **Justification of the period during which the submitting party asserts that material should not be available for public disclosure.** The ACS LECs maintain that the information for which confidential treatment is sought should remain subject to confidential treatment indefinitely. Even historical data can be used to track trends or business decisions, and this information could then be used against the petitioner.
- (9) **Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.** The ACS LECs note that the information for which confidential treatment is sought falls under Exemption 4 of the Freedom of Information Act (FOIA), insofar as this information is (i) commercial or financial in nature; (ii) obtained by a person outside government; and (iii) privileged and confidential. See *Washington Post Co. v. U.S. Department of Health and Human Services*, 690 F.2d 525 (D.C. Cir. 1982)

Please contact the undersigned should you have any questions.

Mariene H. Dortch
January 28, 2010
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Respectfully submitted,

ACS OF ANCHORAGE, INC., ACS OF ALASKA,
INC., AND ACS OF FAIRBANKS, INC.



Karen Brinkmann
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Their Attorneys

WCB/Pricing File No. _____

³ Appendix A contains a list of those services that the ACS LECs believe are Qualifying DT/SA Services.

rules;⁴ and (ii) Phase II relief for channel terminations between their end offices and end-user customer premises ("End-User Channel Terminations"), pursuant to Section 69.711 of the Commission's rules.⁵ As demonstrated herein, the ACS LECs have satisfied the relevant Phase II revenue triggers specified in those rule sections, and therefore are entitled to the requested relief in the areas covered by this petition.

Some of the information contained herein and attached hereto is proprietary to ACS and the ACS LECs, and is being provided pursuant to a request for confidential treatment. Certification that this Petition and accompanying data have been made available to interested parties, as required by 47 C.F.R. § 1.774, is provided at Appendix D.

I. DISCUSSION

A. Geographic Scope of Petition

The ACS LECs seek Phase II pricing flexibility with respect to both the Qualifying DT/SA Services and End-User Channel Terminations in: (i) the Anchorage, Alaska MSA (the "Anchorage MSA"), in which ACSA operates; (ii) the ACS-AK Juneau study area (the "Juneau Non-MSA Area"),⁶ in which ACSAK operates;⁷ and (iii) the Fairbanks, Alaska MSA ("Fairbanks MSA"), in which ACSF operates.⁸

⁴ 47 C.F.R. § 69.709

⁵ 47 C.F.R. § 69.711.

⁶ A price cap LEC may seek pricing flexibility "with respect to those parts of a study area that fall outside of any MSA" 47 C.F.R. § 69.707(b). No portion of ACS-AK Juneau study area lies within any MSA. As such, the entirety of that study area is included in the Juneau Non-MSA Area.

⁷ ACSAK also operates in a second area, ACS-AK Greatland. That study area is not the subject of this petition.

⁸ Pursuant to section 69.707(a)(2) of the Commission's rules, a price cap LEC "may request pricing flexibility for two or more MSAs in a single petition, provided that it submits supporting data disaggregated by MSA." 47 C.F.R. § 69.707(a)(2).

B. Dedicated Transport and Special Access: Phase II Relief

To obtain Phase II relief for dedicated transport and special access services (other than channel terminations between LEC end offices and end-user customer premises), a price cap LEC must show for each MSA or non-MSA area that competitors unaffiliated with the price cap LEC have collocated:

- (a) In 50 percent of the petitioner's wire centers, and that at least one such collocator in each wire center is using transport facilities owned by a transport provider other than the price cap LEC to transport traffic from that wire center;⁹ or
- (b) In wire centers accounting for 65 percent of the petitioner's revenues from dedicated transport and special access services other than channel terminations between LEC end offices and end-user customer premises, determined as specified in Section 69.725 of the Commission's rules, and that at least one such collocator in each wire center is using transport facilities owned by a transport provider other than the price cap LEC to transport traffic from that wire center.¹⁰

As noted above, the ACS LECs seek Phase II pricing flexibility for the Qualifying DT/SA Services in the Anchorage MSA, the Juneau Non-MSA Area, and the Fairbanks MSA. Grant of the requested relief is appropriate if the ACS LECs satisfy either of the thresholds specified above in each of these areas. The ACS LECs rely on the revenues showing below.

C. Channel Terminations Between LEC End Offices and End-User Customer Premises: Phase II Relief

To obtain Phase II relief for channel terminations between LEC end offices and end-user customer premises, a price cap LEC must show for each MSA or non-MSA area that competitors unaffiliated with the price cap LEC have collocated:

- (a) In 65 percent of the petitioner's wire centers, and that at least one such collocator in each wire center is using transport facilities owned by a

⁹ 47 C.F.R. § 69.709(c)(1).

¹⁰ 47 C.F.R. § 69.709(c)(2).

transport provider other than the price cap LEC to transport traffic from that wire center;¹¹ or

- (b) In wire centers accounting for 85 percent of the petitioner's revenues from channel terminations between LEC end offices and end-user customer premises, determined as specified in Section 69.725 of the Commission's rules, and that at least one such collocator in each wire center is using transport facilities owned by a transport provider other than the price cap LEC to transport traffic from that wire center.¹²

As noted above, the ACS LECs seek Phase II pricing flexibility for End-User Channel Terminations in the Anchorage MSA, the Juneau Non-MSA Area, and the Fairbanks MSA. Grant of the requested relief is appropriate if the ACS LECs satisfy either of the thresholds specified above in each of these areas. The ACS LECs rely on the revenues showing below.

D. Section 1.774(a)(3) Showing

Pursuant to Section 1.774(a)(3) of the Commission's rules,¹³ the ACS LECs provide the following information to demonstrate satisfaction of the pricing flexibility relief thresholds set forth in: (i) Section 69.709(a) of the Commission's rules with respect to the Qualifying DT/SA Services; and (ii) Section 69.711(a) of the Commission's rules with respect to End-User Channel Terminations:

- (i) **Total Wire Centers.** There are a total of: (i) 11 wire centers located in the Anchorage MSA; (ii) 4 wire centers in the Juneau Non-MSA Area; and (iii) one wire center located in the Fairbanks MSA.¹⁴

¹¹ 47 C.F.R. § 69.711(c)(1).

¹² 47 C.F.R. § 69.711(c)(2).

¹³ 47 C.F.R. § 1.774(a)(3).

¹⁴ These totals include both host switches and remotes, although the ACS LECs do not concede that any of the remotes constitute wire centers. Remotes are counted as wire centers where the Commission previously has deemed them to be wire centers under the Commission's rules. *See Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as Amended, for Forbearance from Sections 251(c)(3)*

(ii) ***Wire Centers In Which Competitors Have Collocated.*** Appendix B identifies, with respect to each of the Anchorage MSA, Juneau Non-MSA Area, and Fairbanks MSA, those wire centers in which competitors have collocated. In each such wire center, at least one such competitor uses transport facilities owned by a transport provider other than the relevant ACS LEC (or an affiliate thereof) to transport traffic from that wire center. Accordingly, each such wire center is a "Qualifying Wire Center."

(iii) ***Identity of Collocated Competitors.*** Appendix B identifies, with respect to each Qualifying Wire Center, at least one collocated competitor that uses transport facilities owned by a provider other than an ACS LEC (or affiliate thereof) to transport traffic from that Qualifying Wire Center.¹⁵

(iv) ***Percentage of Revenues Attributable to Qualifying Wire Centers.***

Appendix B identifies the revenues attributable to each Qualifying Wire Center, and to each MSA or non-MSA area in the aggregate, and provides the basis for the percentage figures reported below.

Anchorage MSA – Approximately 98 percent of ACSA's total revenues generated in the Anchorage MSA from Qualifying DT/SA Services, and approximately 96 percent of ACSA's total revenues generated in the Anchorage MSA from End-User Channel Terminations, are attributable to Qualifying Wire

and 252(d)(1) in the Anchorage Study Area, Memorandum Opinion and Order, 22 FCC Rcd 1958, at ¶ 17 (2007) ("252(c)(3) Petition"). In any event, the number of wire centers is irrelevant to the instant analysis because ACS relies on the applicable revenue tests under the Commission's rules in seeking pricing flexibility relief. Wire center figures are provided herein only to comply with Section 1.774(a)(3)(i) of the Commission rules. 47 C.F.R. § 1.774(a)(3)(i).

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A competitor or competitors other than those identified in Appendix B also may be collocated in any given Qualifying Wire Center.

Centers located in the Anchorage MSA.

Juneau Non-MSA Area – Approximately 94 percent of ACSAK's total revenues generated in the Juneau Non-MSA Area from Qualifying DT/SA Services, and approximately 99 percent of ACSAK's total revenues generated in the Juneau Non-MSA Area from End-User Channel Terminations, are attributable to Qualifying Wire Centers located in the Juneau Non-MSA Area.

Fairbanks MSA – The Fairbanks MSA includes only one wire center, which is a Qualifying Wire Center. One-hundred percent of ACSF's total revenues generated in the Fairbanks MSA from Qualifying DT/SA Services, and one-hundred percent of ACSF's total revenues generated in the Fairbanks MSA from End-User Channel Terminations, are attributable to that Qualifying Wire Center.

Appendix C describes the methodology used by ACS in gathering the information requested by Section 1.774(a)(3). As demonstrated therein, ACS's methodology is consistent with Section 69.725 of the Commission's rules.¹⁶

E. Section 1.774(e) Notice

The ACS LECs are required to provide to each collocating party any information regarding that collocator upon which the ACS LECs rely in this Petition, even if the ACS LECs request that the information be kept confidential. Appendix D sets forth the ACS LECs' certification that they have provided the required notice to the collocating parties on which the ACS LECs rely, together with copies of the letters required by Section 1.774(e)(1)(ii) of the Commission's rules.¹⁷

¹⁶ 47 C.F.R. § 69.725.

¹⁷ 47 C.F.R. § 1.774(e)(1)(ii).

II. CONCLUSION

Based on the foregoing information contained herein and attached hereto, the Commission should grant this Petition for pricing flexibility. The ACS LECs have demonstrated that they meet the requirements for Phase II relief for the respective services described herein in the Anchorage MSA, Juneau Non-MSA Area, and Fairbanks MSA. Granting such relief would be consistent with Commission rules and policies adopted in the *Pricing Flexibility Order*, and would serve the public interest, convenience, and necessity.

Respectfully submitted,

ACS OF ANCHORAGE, INC., ACS OF ALASKA,
INC., AND ACS OF FAIRBANKS, INC.



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January 29, 2010

Appendices

Appendix A: Qualifying DT/SA Services

Appendix B: Wire Center Revenue and Collocation Data

Appendix C: Description of Methodology

Appendix D: Section 1.774(e) Certification

Appendix A: Qualifying DT/SA Services

Special Access Basket

Metallic

Voice Grade

Program Audio

Video Wideband Analog

Wideband Data

Digital Data Service

Fiber Optic Service

DS1

DS3

Ethernet

Trunking Basket

Metallic

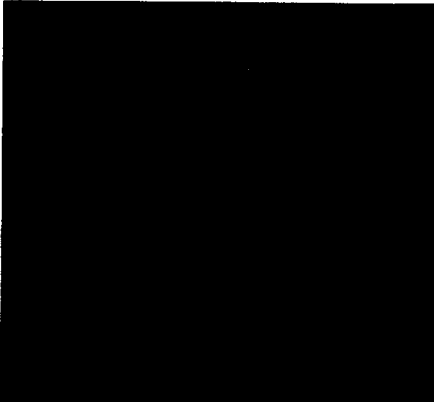






Voice Grade

DS1

DS3

Fiber Optic Service

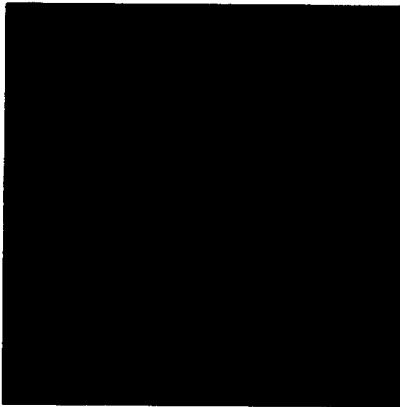
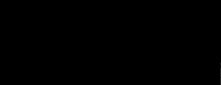
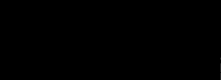
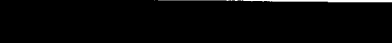
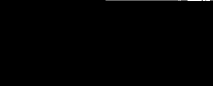
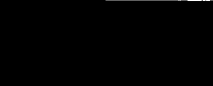

Appendix B: Wire Center Revenue and Collocation Data for DT/SA Services (Excluding End-User Channel Terminations)

Wire Center CLI	Wire Center Name	Revenues from DT/SA Services (Excluding End- User Channel Terminations)	Collocator(s) w/ Alternative Transport
Anchorage MSA			
ANCRAKXCDS1	Central Wire Center		
ANCRAKXNDS1	North Wire Center		
ANCRAKXSDS1	South Wire Center		
ANCRAKXEDS1	East Wire Center		
ANCRAKXWDS1	West Wire Center		
ANCRAKXRRS1	Rabbit Creek Wire Center		
ANCRAKXORS1	O'Malley Wire Center		
ELMNAKXARS1	Elmendorf		
FTRCAKXARS1	Ft. Richardson		
GRWDAKXARS1	Girdwood		
INDNAKXARS1	Indian		
Total Wire Centers		11	
Wire Centers with Collocation and Alternative Transport		7	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		97.7%	
Fairbanks MSA			
FRBNAKXADS1	Globe		
Total Wire Centers		1	
Wire Centers with Collocation and Alternative Transport		1	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		100.0%	
Juneau Non-MSA Area			
JUNEAKXADS1	Juneau Main		
JUNEAKXSRS1	Sterling		


Appendix B: Wire Center Revenue and Collocation Data for DT/SA Services (Excluding End-User Channel Terminations)

Wire Center CLLI	Wire Center Name	Revenues from DT/SA Services (Excluding End- User Channel Terminations) Collocator(s) w/ Alternative Transport
JUNEAKXBRS1	Auke Bay	
DGLSAKXARS1	Douglas	
Total Wire Centers		4
Wire Centers with Collocation and Alternative Transport		2
Total Revenues		
Qualifying Revenues		
Percentage Qualifying Revenues		94.2%

Appendix B: Wire Center Revenue and Collocation Data for End-User Channel Terminations

Wire Center CLLI	Wire Center Name	Revenues from Channel Terminations to End Users	Collocator w/ Alternative Transport
Anchorage MSA			
ANCRAKXCDS1	Central Wire Center		
ANCRAKXNDS1	North Wire Center		
ANCRAKXSDS1	South Wire Center		
ANCRAKXEDS1	East Wire Center		
ANCRAKXWDS1	West Wire Center		
ANCRAKXRRS1	Rabbit Creek Wire Center		
ANCRAKXORS1	O'Malley Wire Center		
ELMNAKXARS1	Elmendorf		
FTRCAKXARS1	Ft. Richardson		
GRWDAKXARS1	Girdwood		
INDNAKXARS1	Indian		
Total Wire Centers		11	
Wire Centers with Collocation and Alternative Transport		7	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		96.1%	
Fairbanks MSA			
FRBNAKXADS1	Globe		
Total Wire Centers		1	
Wire Centers with Collocation and Alternative Transport		1	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		100.0%	
Juneau Non-MSA Area			
JUNEAKXADS1	Juneau Main		
JUNEAKXSRS1	Sterling		
JUNEAKXBRS1	Auke Bay		
DGLSAKXARS1	Douglas		

Appendix B: Wire Center Revenue and Collocation Data for End-User Channel Terminations

Wire Center CLLI	Wire Center Name	Revenues from Channel Terminations to End Users	Collocator w/ Alternative Transport
Total Wire Centers		4	
Wire Centers with Collocation and Alternative Transport		2	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		99.2%	

Appendix C: Description of Methodology

The ACS LECs used the following methodology to satisfy the collocation and revenue requirements necessary to obtain pricing flexibility for the services described in Sections 69.709(a) and 69.711(a) of the Commission's rules¹ in the MSAs and non-MSA area subject to this petition. Specifically, the ACS LECs did the following:

First, the ACS LECs identified those wire centers located within the Anchorage MSA, Juneau Non-MSA Area, and Fairbanks MSA that are Qualifying Wire Centers.² A wire center was treated as a Qualifying Wire Center if it contained "at least one collocator that uses transport facilities owned by a provider other than the price cap LEC to transport traffic from that wire center."³ The ACS LECs identified Qualifying Wire Centers by: (i) interviewing regional General Managers of ACS, in the first instance, to identify candidate wire centers; (ii) evaluating, with respect to each candidate wire center, collocation billing records in order to identify competitive service providers collocated at those wire centers and using non-ACS transport facilities; and (iii) tasking field personnel to physically verify that candidate wire centers were, in fact, Qualifying Wire Centers in which competitors are collocated and using non-ACS transport facilities.⁴

Second, the ACS LECs identified, for each wire center within the Anchorage MSA, Juneau Non-MSA Area, or Fairbanks MSA, revenues generated by the dedicated transport and special access services listed in Appendix A ("DT/SA Revenues") and End-User Channel Terminations ("End-User Channel Termination Revenues"). The ACS LECs first broke down January 2010 base period demand by wire center and rate element, using data from their Carrier Access Billing System ("CABS"), which maintains records with respect to each ACS circuit. Generally: (i) where a circuit record identified a single ACS wire center, 100 percent of associated demand was attributed to that wire center; (ii) where a circuit record identified two ACS wire centers, 50 percent of associated demand was attributed to each of these wire centers; and (iii) where a circuit record identified an ACS wire center and a wire center operated by a competitor, 100 percent of the associated demand was attributed to the ACS wire center. Where necessary, these data were examined further to ensure that they were used properly (*e.g.*, circuit records with respect to channel terminations at offices serving IXC POPs were examined to determine whether the channel termination was a carrier's POP).

Once demand had been determined by wire center, revenue by wire center was derived by rating out demand at the rates in effect. The results were balanced to the revenues filed in the ACS LECs' most recent price cap filing to ensure accuracy. Revenues attributable to the Anchorage MSA, Juneau Non-MSA Area, or Fairbanks MSA then were sorted by category and wire center, and aggregated by wire center into the general categories of DT/SA Revenues and End-User Channel Termination Revenues. For this purpose, the ACS LECs were careful to

¹ 47 C.F.R. §§ 69.709(a), 69.711(a).

² These wire centers are listed in Appendix B. Certain revenue data in that exhibit is proprietary to ACS and submitted pursuant to a request for confidential treatment

³ 47 C.F.R. § 1.774(a)(3)(iii).

⁴ Collocation information contained in this Petition includes only those wire centers identified to date and may be supplemented in future petitions.

distinguish between channel terminations provided to an end-user premise and channel terminations provided to an IXC POP.⁵

Third, the ACS LECs identified the percentage of DT/SA Revenues and End-User Channel Termination Revenues attributable to each of the Qualifying Wire Centers. The ACS LECs used the methodology described above to attribute rate elements to specific wire centers, and determine the DT/SA Revenues attributable to Qualifying Wire Centers (“Qualifying DT/SA Revenues”) and End-User Channel Termination Revenues attributable to Qualifying Wire Centers (“Qualifying End-User Channel Termination Revenues”) in each of the Anchorage MSA, Juneau Non-MSA Area, and Fairbanks MSA. For each of these areas, the ACS LECs then divided the Qualifying DT/SA Revenues by total DT/SA Revenues; and Qualifying End-User Channel Termination Revenues by total End-User Channel Termination Revenues. These values exceed the applicable revenue triggers set forth in Sections 69.709 and 69.711 in each case.

⁵ The ACS LECs made this determination based on the nature of the associated rate element, in a manner consistent with the methodology used to populate the revenues from channel terminations on form RTE-1 of the Commission’s Tariff Review Plan.

Appendix D: Section 1.774(e) Certification

Pursuant to § 1.774(e) of the Commission's rules, I, Tom Meade, hereby certify that I have sent a letter to the collocating party upon which the ACS LECs relies in this filing, informing it of the information about them that is included in this Petition. The letter was provided to on January 29, 2010, via email to: . A copy of the letter is attached.



Name: Tom Meade

Title: Vice President, Carrier Market
Economic Analysis

January 29, 2010



January 29, 2010

RE: ACS Petition for Phase II Pricing Flexibility

Dear Sir/Madam:

ACS of Anchorage, Inc., ACS of Alaska, Inc., and ACS of Fairbanks, Inc. (collectively, "ACS") will shortly file with the Federal Communications Commission a Petition for Phase II Pricing Flexibility. Appendix B to the Petition indicates that

is currently collocating in certain of ACS's wire centers. Pursuant to Section 1.774(e)(1)(ii) of the Commission's rules, 47 C.F.R. § 1.774(e)(1)(ii), ACS is forwarding to you a copy of Appendix B. Please note that because ACS intends to request confidential treatment of certain information presented in the Petition, portions of the enclosed Appendix B not related to your company have been redacted.

If you have any questions please feel free to contact me at (907) 564-1935.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Meade". The signature is written over a horizontal line.

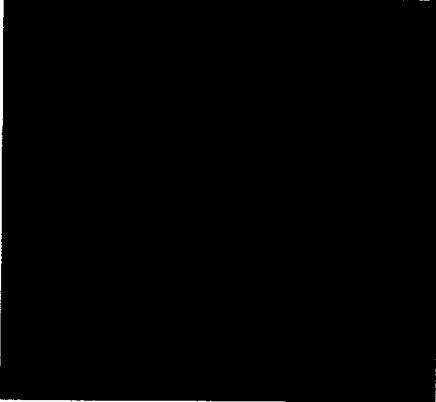
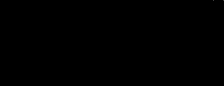
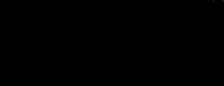




Name: Tom Meade

Title: Vice President, Carrier Market
Economic Analysis

TM/dky

Enc: Appendix B (partially redacted)

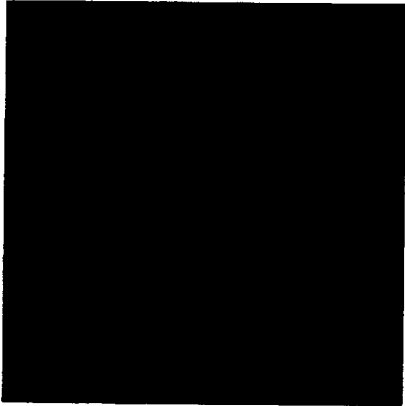






Appendix B: Wire Center Revenue and Collocation Data for DT/SA Services (Excluding End-User Channel Terminations)

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ANCRAKXNDS1	North Wire Center		
ANCRAKXSDS1	South Wire Center		
ANCRAKXEDS1	East Wire Center		
ANCRAKXWDS1	West Wire Center		
ANCRAKXRRS1	Rabbit Creek Wire Center		
ANCRAKXORS1	O'Malley Wire Center		
ELMNAKXARS1	Elmendorf		
FTRCAKXARS1	Ft. Richardson		
GRWDAKXARS1	Girdwood		
INDNAKXARS1	Indian		
Total Wire Centers		11	
Wire Centers with Collocation and Alternative Transport		7	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		97.7%	
Fairbanks MSA			
FRBNAKXADS1	Globe		
Total Wire Centers		1	
Wire Centers with Collocation and Alternative Transport		1	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		100.0%	
Juneau Non-MSA Area			
JUNEAKXADS1	Juneau Main		
JUNEAKXSRS1	Sterling		

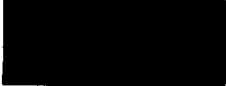
Appendix B: Wire Center Revenue and Collocation Data for DT/SA Services (Excluding End-User Channel Terminations)

		Revenues from DT/SA Services (Excluding End- User Channel Terminations)	Collocator(s) w/ Alternative Transport
Wire Center CLLI	Wire Center Name		
JUNEAKXBRS1	Auke Bay		
DGLSAKXARS1	Douglas		
Total Wire Centers		4	
Wire Centers with Collocation and Alternative Transport		2	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		94.2%	

Appendix B: Wire Center Revenue and Collocation Data for End-User Channel Terminations

Wire Center CLI	Wire Center Name	Revenues from Channel Terminations to End Users	Collocator w/ Alternative Transport
Anchorage MSA			
ANCRAKXCDS1	Central Wire Center		
ANCRAKXNDS1	North Wire Center		
ANCRAKXSDS1	South Wire Center		
ANCRAKXEDS1	East Wire Center		
ANCRAKXWDS1	West Wire Center		
ANCRAKXRRS1	Rabbit Creek Wire Center		
ANCRAKXORS1	O'Malley Wire Center		
ELMNAKXARS1	Elmendorf		
FTRCAKXARS1	Ft. Richardson		
GRWDAKXARS1	Girdwood		
INDNAKXARS1	Indian		
Total Wire Centers		11	
Wire Centers with Collocation and Alternative Transport		7	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		96.1%	
Fairbanks MSA			
FRBNAKXADS1	Globe		
Total Wire Centers		1	
Wire Centers with Collocation and Alternative Transport		1	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		100.0%	
Juneau Non-MSA Area			
JUNEAKXADS1	Juneau Main		
JUNEAKXSRS1	Sterling		
JUNEAKXBRS1	Auke Bay		
DGLSAKXARS1	Douglas		

Appendix B: Wire Center Revenue and Collocation Data for End-User Channel Terminations

Wire Center CLLI	Wire Center Name	Revenues from Channel Terminations to End Users	Collocator w/ Alternative Transport
Total Wire Centers		4	
Wire Centers with Collocation and Alternative Transport		2	
Total Revenues			
Qualifying Revenues			
Percentage Qualifying Revenues		99.2%	