

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

Petition for Ruling that General	)	
Communication, Inc. Be Treated As the	)	
Incumbent Local Exchange Carrier in the	)	WC Docket No. 17-181
ACS of Anchorage, LLC Study Area	)	
Pursuant to Section 251(h)(2) of the	)	
Communications Act	)	

**OPPOSITION OF GENERAL COMMUNICATION, INC.**

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August 7, 2017

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## I. INTRODUCTION AND SUMMARY

General Communication, Inc. (“GCI”) strongly opposes the petition filed by Alaska Communications Services (“ACS”) requesting a ruling that GCI be treated as the sole incumbent local exchange carrier (“ILEC” or “incumbent LEC”) in the ACS of Anchorage study area<sup>1</sup> pursuant to Section 251(h)(2), and that ACS cease to be treated as an ILEC.<sup>2</sup> First and foremost, a 251(h)(2) petition is not the proper vehicle for relieving an ILEC of its ILEC obligations. Moreover, granting the ACS petition would both ignore the statutory requirements for removal of regulatory obligations through forbearance, and would not serve the public interest, convenience, or necessity and purposes of Section 251. Accordingly, ACS’s petition should be denied.

ACS essentially makes two requests in its petition: (1) to be relieved of its ILEC status, except with respect to receiving Connect America Fund (“CAF”) Phase II support; and (2) to assign ILEC status to GCI, except with respect to receiving CAF Phase II support. The FCC has made clear that a 251(h)(2) petition is not the proper vehicle for relieving an ILEC of its ILEC obligations. Instead, relief from such obligations must be pursued through a Section 10 forbearance request. Moreover, GCI does not meet Section 251(h)(2)’s test for designating a local exchange carrier (“LEC”) to be an ILEC. ACS relies exclusively on the FCC’s approval of Mid-Rivers Telephone Cooperative, Inc.’s (“Mid-Rivers”) request to be designated an ILEC in

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<sup>1</sup> *Certificate of Public Convenience and Necessity No. 120 Granted to ACS of Anchorage, LLC d/b/a Alaska Communications Systems, Alaska Communications, ACS Local Service, and ACS*, Appendix A. The boundaries of the ACS of Anchorage study area, as defined by the Regulatory Commission of Alaska (“RCA”), are available from the RCA web site: <http://rca.alaska.gov/RCAWeb/ViewFile.aspx?id=45a47855-662d-4ded-ac0d-a309988c8482>.

<sup>2</sup> *Petition For Ruling That General Communication, Inc. Be Treated As the Incumbent Local Exchange Carrier In the ACS of Anchorage, LLC Study Area Pursuant to Section 251(h)(2) of the Communications Act*, Petition for Ruling, WC Docket No. 17-181 (filed July 7, 2017) (“ACS Petition”).

Terry, Montana (the “*Mid-Rivers Order*”).<sup>3</sup> However, Mid-Rivers had overbuilt 100 percent of the locations in Terry primarily over its own facilities and had substantially replaced Qwest Communications International, Inc. (“Qwest”) in serving that community. Notably, the FCC did *not* relieve Qwest of its ILEC status or obligations in the *Mid-Rivers Order*.

## **II. ACS MUST PETITION FOR REMOVAL OF ITS ILEC STATUS UNDER SECTION 10, NOT SECTION 251(H)(2)**

As the FCC made clear in the *Mid-Rivers Order*, Section 251(h)(2) is not the proper vehicle for the FCC to relieve ACS of its ILEC status. Rather, the proper vehicle is a petition for forbearance. ACS does not, however, meet the forbearance standard. Moreover, if the FCC were to relieve ACS of its ILEC status, ACS would no longer be eligible for the benefits that accrue to an ILEC, despite its claims otherwise.

### **A. The Proper Procedural Vehicle for ACS’s Request to be Relieved of its ILEC Obligations is a Petition for Forbearance.**

By its plain language, Section 251(h)(2) does not provide ILECs with relief from ILEC obligations based on the language of the statute. As the FCC notes in the *Mid-Rivers Order*, “[t]here is no indication in the statute that designating a LEC as an incumbent LEC for purposes of section 251 was intended to lift section 251(c) obligations from the legacy incumbent LEC automatically without adhering to the mechanisms provided in the Act for removal of unnecessary regulation.”<sup>4</sup> The FCC went on to find that, “Accordingly, we do not accept the

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<sup>3</sup> *Petition of Mid-Rivers Telephone Cooperative, Inc. for Order Declaring It To Be an Incumbent Local Exchange Carrier in Terry, Montana Pursuant to Section 251(h)(2)*, Report & Order, 21 FCC Rcd. 11,506 (2006) (“*Mid-Rivers Order*”).

<sup>4</sup> *Id.* at 11,517 n.69.

suggestion of some commenters that the requirements of section 10 for removal of section 251(c) obligations are automatically met if the elements of section 251(h)(2) are satisfied.”<sup>5</sup>

Rather, the proper remedy for ACS to remove its ILEC obligations is to file a request for forbearance under Section 10 of the Communications Act of 1934, as it has done previously, including in September 2005<sup>6</sup> and May 2006.<sup>7</sup> The ACS Petition cannot be considered as if it were a forbearance petition. The Commission has also established specific procedural requirements for forbearance petitions, including that they must be filed as a separate pleading, and must include forbearance in the caption.<sup>8</sup> Furthermore, the Petition must be complete as filed, including detailing the specific forbearance sought and a prima facie case justifying that forbearance.<sup>9</sup> ACS meets none of these requirements.

In its petition, ACS also conveniently ignores the law and precedent surrounding the original ILEC designations and regulations, which were meant to address the monopoly status of incumbents, with the benefits of buildout funded by monopoly ratepayers, and make room for competitors to enter the market. Importantly, ACS sidesteps the fact that, in the years following the 1996 Act, it selected where and when to invest (or, frequently, not to invest) and now seeks

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<sup>5</sup> *Id.*

<sup>6</sup> *Petition of ACS of Anchorage, Inc. Pursuant to 1 Section 10 of the Communications Act of 1934, as amended, for Forbearance from Sections 251 (c)(3) and 252(d)(1) in the Anchorage LEC Study Area*, Petition for Forbearance, WC Docket No. 05-281 (filed September 30, 2005).

<sup>7</sup> *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as Amended (47 U.S.C. § 160(c)), for Forbearance from Certain Dominant Carrier Regulation of Its Interstate Access Services, and for Forbearance from Title II Regulation of Its Broadband Services, in the Anchorage, Alaska, Incumbent Local Exchange Carrier Study Area*, Petition for Forbearance, WC Docket No. 06-109 (filed May 22, 2006).

<sup>8</sup> See 47 C.F.R. § 1.53.

<sup>9</sup> See 47 U.S.C. § 1.54.

to utilize Section 251(h)(2) as a safety net for those investment decisions. Moreover, ACS has failed to provide the FCC with the complete picture of its market position in the ACS of Anchorage study area. Indeed, ACS has reported growth in its business segment in 2016, and thus far in 2017. At a minimum, the FCC must consider all of ACS's relevant facilities as part of any forbearance analysis.

**B. ACS Should Not be Allowed to Retain ILEC Benefits if ILEC Duties are Removed.**

ACS's petition brings to mind the old adage "you can't have your cake and eat it too." ACS asks to be relieved of its ILEC status, but then claims that "[n]othing in this petition is intended to affect ACS of Anchorage's eligibility for high-cost support under the Connect America Fund program or its status as an eligible telecommunications carrier ('ETC') under the Communications Act and Part 54 of the FCC's rules."<sup>10</sup> ACS, seemingly knowing that this is a bridge too far, places its request in two footnotes in its petition. If ACS is no longer an ILEC, then it is not eligible to receive CAF Phase II support, and that fixed broadband support should be auctioned.

As the FCC announced in October 2016, ACS is to receive nearly \$20 million annually for a 10-year term in CAF Phase II support.<sup>11</sup> Surely, ACS cannot believe that, on the one hand, it can be relieved of all ILEC obligations, but on the other hand it can still preserve the benefits that accrue only to an ILEC. Indeed, ACS remained in active negotiation with the Commission regarding its CAF Phase II support, and ACS's associated performance obligations, in the days before that order was issued. ACS's intention to seek relief from its ILEC status would surely

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<sup>10</sup> ACS Petition at 5 n.9.

<sup>11</sup> *Connect America Fund, et al.*, Order, 31 FCC Rcd. 5949 (2016).

have been relevant to those discussions, yet the record includes no suggestion that ACS ever disclosed it.

### **III. GCI DOES NOT MEET THE THREE-PART TEST IN SECTION 251(H)(2) IN THE ACS OF ANCHORAGE STUDY AREA**

In petitioning the FCC pursuant to Section 251(h)(2), ACS asks the FCC to rule that GCI should be treated as the sole ILEC in the ACS of Anchorage study area. Section 251(h)(2) provides that the FCC may by rule provide for the treatment of a LEC as an ILEC for the purposes of Section 251 if a three-part test is met: (1) the LEC at issue must occupy a market position comparable to a legacy ILEC; (2) the LEC must have “substantially replaced” the legacy ILEC; and (3) the reclassification must serve the public interest, convenience, and necessity and purposes of Section 251.<sup>12</sup> As we explain in greater detail below, GCI does not meet the standards established under Section 251 for reclassification as an ILEC.

#### **A. GCI Does Not Occupy a Market Position Comparable to a Legacy ILEC.**

The first part of the Section 251(h)(2) test requires that the carrier at issue “occup[y] a position in the market for telephone exchange service within an area that is comparable to the position occupied by [an ILEC].”<sup>13</sup> ACS relies heavily on the *Mid-Rivers Order* in support of its petition. However, this reliance is misplaced.

The *Mid-Rivers Order* presented a different situation than ACS and GCI in Anchorage for a number of reasons. First, Mid-Rivers itself petitioned the FCC to classify it as an ILEC. In the present scenario, ACS seeks to impose ILEC obligations on its long-time competitor. Moreover, Qwest agreed to and supported Mid-Rivers’ petition. In the present scenario there are not two parties in agreement with the underlying goal or the facts supporting the petition.

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<sup>12</sup> 47 U.S.C. § 251(h)(2).

<sup>13</sup> *Id.*

Finally, and most importantly, Mid-Rivers served approximately 93 percent of the access lines in the entire Terry exchange at the time of the petition, and close to 100 percent by the time the FCC issued its decision.<sup>14</sup> While these lines were provided in most cases over Mid-Rivers’ own facilities, ACS conflates the retail market with facilities-based competition in its petition and entirely ignores this distinction. But ACS is not ignorant of what the relevant inquiry is. Indeed, the FCC’s analyses of ACS’s past forbearance petitions were based on an analyses of the facilities-based market.<sup>15</sup> As we detail below, GCI’s market share of access lines is much lower than in the *Mid-Rivers Order*, whether measured by lines provided over GCI’s own facilities or in combination with lines provisioned using ACS wholesale inputs.

Specifically, the FCC found that Mid-Rivers occupied a position in the market for local exchange service comparable to that of a legacy incumbent ILEC since it served “between 85 and 93 percent of the access lines in the Terry exchange, in most cases over its own facilities.”<sup>16</sup> GCI does not possess comparable market share to Mid-Rivers—either using its own facilities or ACS’s facilities—in the ACS of Anchorage study area. In fact, GCI provides only roughly 58% of the access lines in the study area, which is less than Mid-Rivers’ “between 85 and 93 percent”

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<sup>14</sup> *Mid-Rivers Order* ¶ 2.

<sup>15</sup> See *Petition of ACS of Anchorage, Inc. Pursuant to 1 Section 10 of the Communications Act of 1934, as amended, for Forbearance from Sections 251 (c)(3) and 252(d)(1) in the Anchorage LEC Study Area*, Memorandum Opinion and Order, 22 FCC Rcd.1958, 1971 ¶20 (2006) (“*ACS UNE Forbearance Order*”) (basing its decision primarily on the development of sufficient facilities-based competition); *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as Amended (47 U.S.C. § 160(c)), for Forbearance from Certain Dominant Carrier Regulation of Its Interstate Access Services, and for Forbearance from Title II Regulation of Its Broadband Services, in the Anchorage, Alaska, Incumbent Local Exchange Carrier Study Area*, Memorandum Opinion and Order, 22 FCC Rcd. 16304, 16306 ¶ 3 (2007) (basing its decision on the evidence of facilities-based competition in the Anchorage market).

<sup>16</sup> *Mid-Rivers Order* ¶ 12.



by a significant amount.<sup>17</sup> Notably, according to ACS's own submissions to the RCA, ACS itself continues to provide the majority of switched minutes in Anchorage, with 56.4% of local and 61.3% of intrastate originating and terminating access minutes respectively.<sup>18</sup>

ACS is the leading transit provider in Anchorage for voice services, and also serves many legacy business locations in Anchorage where GCI cannot offer services because it lacks network facilities in those locations. There are many locations that neither GCI nor any other competitor can serve without access to ACS facilities because ACS is the only facilities-based provider at those locations. For instance, there are entire communities in the ACS of Anchorage study area where GCI must rely entirely on ACS's facilities to provide service, including Indian, Hope, and Portage. Moreover, GCI relies on ACS's facilities, including resold retail lines, unbundled network elements (UNEs), or commercial agreement loops, to service customers in every one of the eleven wire centers listed in the National Exchange Carrier Association's FCC Tariff 4 for ACS of Anchorage (Elmendorf, Ft. Richardson, Girdwood, Indian, Central, East, North, O'Malley, Rabbit Creek, South, and West).

GCI uses ACS facilities to reach a large number of enterprise customers. GCI purchases over 500 T-I UNEs, 328 special access circuits, and 2,100 wholesale and single UNE loops to customers in the ACS of Anchorage study area from ACS in order to provision lines to business customers. This represents thousands of locations that GCI is clearly unable to serve using its

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<sup>17</sup> See *July 1, 2017 Annual Access Charge Tariff Filings*, WC Docket No. 17-65 (filed June 16, 2017); *2016 Annual Common Carrier Line Report - Non-Pooling for GCI Communication Corp*, Report, RCA Tracking No. TR1703634 (filed July 18, 2017). This percentage includes access lines provisioned by GCI using either its own facilities or UNEs (which are actually ACS facilities), but not using wholesale lines. Including such wholesale lines provided over ACS's facilities is irrelevant to this inquiry, but, in any event, would not have a significant impact.

<sup>18</sup> *2016 Annual Common Carrier Line Report - Non-Pooling for ACS of Anchorage, LLC*, Report, RCA Tracking No. TR1703685 (filed July 20, 2017).

own facilities in the Anchorage area, and these circuits represent only a portion of the locations that GCI is unable to reach using its own facilities.

In addition, while GCI purchases access to UNE loops and resold services in the five wire centers in which ACS was previously granted forbearance from mandatory unbundling of network elements, today ACS is still required to sell UNEs in several areas in the ACS of Anchorage study area, including Rabbit Creek and O'Malley. GCI purchases such UNEs from ACS in these areas and uses them to provide service to end user customers. Furthermore, GCI has to co-locate with ACS in order to carry both municipal and long-distance traffic.

Therefore, unlike the situation in the *Mid-Rivers Order*, GCI does not occupy a market position comparable to ACS. The fact that GCI must rely on ACS to deliver services in the ACS of Anchorage study area is strong evidence that it holds a different position than ACS in this area.

**B. GCI Has Not “Substantially Replaced” the Legacy ILEC.**

The second part of the Section 251(h)(2) test requires a finding that “such carrier has substantially replaced an incumbent LEC described in paragraph (1)”<sup>19</sup>—in this case ACS. Since, as described above, GCI does not occupy a market position comparable to ACS, GCI cannot have “substantially replaced” ACS. In the *Guam Proceeding*, the FCC found that Section 251(h)(2)(B) was satisfied when the LEC, the historical monopoly telephone provider on Guam,<sup>20</sup> provided local exchange service “to all or virtually all” of the subscribers in the service

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<sup>19</sup> 47 U.S.C. § 251(h)(2).

<sup>20</sup> *Guam Pub. Utilities Comm’n*, Declaratory Ruling and Notice of Proposed Rulemaking, 12 FCC Rcd. 6925, 6931 ¶ 6 (1997) (“GTA appears to be the sole provider of local telephone service to the more than 130,000 residents of Guam.”); *Treatment of the Guam Tel. Auth. and Similarly Situated Carriers as Incumbent Local Exch. Carriers Under Section 251(h)(2) of the Commc’ns Act*, Report and Order, 13 FCC Rcd. 13,765, 13,769 ¶ 2 (1998). GTA stated that it was ““the sole provider of local exchange and exchange access services on Guam and, in that

area.<sup>21</sup> As explained in detail above, GCI does not provide local exchange service to all or even “virtually all” of the subscribers in the relevant service area. In fact, it provides less than half of all switched access minutes originating or terminating in Anchorage. And, as explained above, it relies on ACS facilities to deliver services to many of those locations.

**C. Reclassification Would Not Serve the Public Interest, Convenience, and Necessity and Purposes of Section 251.**

The third and final part of the Section 251(h)(2) test requires the FCC to find that treating the LEC as an ILEC for purposes of Section 251 “is consistent with the public interest, convenience, and necessity and purpose of [Section 251].”<sup>22</sup> GCI’s designation as an ILEC would not be consistent with the public interest. On the contrary, designating GCI as the ILEC would likely be harmful to consumers. GCI does not have access to all, or even “virtually all,”<sup>23</sup> legacy locations in Anchorage, therefore CLEC’s would have decreased access to the Anchorage market. Further, because GCI continues to rely on ACS facilities in many locations, end user services could be disconnected if GCI no longer has access to ACS facilities. GCI is not the only provider that depends on ACS for transit and other services. Many CLECs have existing agreements with ACS, predicated on its ILEC status, and may not also have existing agreements with GCI. These CLECs may not be able to obtain the same services from GCI as they currently receive from ACS. Indeed, GCI itself, after extensive negotiations, recently entered into a new

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respect, is certainly comparable to incumbent LECs,” and supported its classification as an ILEC. *Id.* ¶ 5.

<sup>21</sup> *Guam Pub. Utilities Comm’n*, Declaratory Ruling and Notice of Proposed Rulemaking, 12 FCC Rcd. 6925, 6943, 6947 ¶¶ 31, 38 (1997); *Treatment of the Guam Tel. Auth. and Similarly Situated Carriers as Incumbent Local Exch. Carriers Under Section 251(h)(2) of the Commc’ns Act*, Report and Order, 13 FCC Rcd. 13,768, 13,769 ¶ 6 (1998).

<sup>22</sup> 47 U.S.C. § 251(h)(2).

<sup>23</sup> *Mid-Rivers Order* ¶ 15.

set of access agreement with ACS. But ACS's requested reclassification would allow it essentially to tear up these agreements even though some, such as GCI's, were entered into only a few short months ago. Moreover, if GCI does not have the ability to offer its network on an unbundled basis it would drive up costs to consumers.

Removing ACS's ILEC designation would also fail to serve the public interest. Once ACS is free from price cap obligations in Anchorage, it could increase its prices, which would likely raise costs for consumers. For instance, on July 14, 2017, ACS notified the RCA that it would be raising its individual residential POTS line rate.<sup>24</sup> Notably, if the FCC were to grant ACS's requested relief, then the CLEC in the ACS of Anchorage study area would be charging customers significantly more than the ILEC. Moreover, not only would freeing ACS from its responsibility to offer network elements on an unbundled basis harm competition and reduce the overall availability of these services, it would also offer only marginal benefits to ACS. ACS has already negotiated commercial agreements for unbundled access, and already benefits from Commission forbearance from its unbundling rules with respect to many ACS wire centers.<sup>25</sup>

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<sup>24</sup> See *Individual Residential Line Alignment*, Tariff, RCA Tracking No. TR1703557 (filed July 14, 2017) (attached hereto as "Exhibit A").

<sup>25</sup> See *ACS UNE Forbearance Order*.

#### IV. CONCLUSION

For the aforementioned reasons, GCI opposes ACS's petition requesting a ruling that GCI be treated as the sole ILEC in the ACS of Anchorage study area pursuant to Section 251(h)(2), and that ACS cease to be treated as an ILEC. ACS has chosen the wrong procedural vehicle to request removal its ILEC status. Moreover, GCI does not meet the test under Section 251(h)(2). The FCC should be leery of ACS's petition: Granting the petition would establish a harmful precedent for other ILECs, and would not serve the public interest, convenience, or necessity and purposes of Section 251.

Respectfully submitted,



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*Counsel for General Communication, Inc.*

August 7, 2017

## **CERTIFICATE OF SERVICE**

I hereby certify that, on this 7<sup>th</sup> day of August, 2017, a copy of the foregoing pleading was served via first class mail upon:

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## **EXHIBIT A**



July 14, 2017

Regulatory Commission of Alaska  
701 West 8<sup>th</sup> Avenue, Suite 300  
Anchorage, Alaska 99501

RE: TA557-120, Individual Residential Line Alignment

Dear Commissioners:

ACS of Anchorage, LLC (ACS-AN) hereby transmits the tariff filing described below in compliance with the Alaska Public Utilities Regulatory Act, and Sections 3 AAC 53.243 of the Alaska Administrative Code.

In accordance with 3 AAC 53.243(d)(2)(B), ACS-AN provides the following summary of tariff changes proposed in TA557-120. The proposed tariff filing attempts to align the individual residential line rate of \$19.00 between all competitive exchanges served by Alaska Communications. This filing also aligns and simplifies the charge for telephone facilities reservations. Historically this charge has been listed an amount equal to 50% of the residential line charge. This revision simplifies the language to make clear that facilities reservations are 50% of the residential line charge.

As a housekeeping revision ACS-AN has deleted the reference to the Entertainment Package and Wireless Bundle in the Table of Contents that was approved in TA556-120.

All revised tariff sheets included in TA557-120 contain the proper tariff sheet margin notations in order to identify the location of all proposed revisions (*see* 3 AAC 53.243(e)(2)(G)). In addition, ACS-AN has elected in this filing to remove all previously required tariff sheet boxes (*see* 3 AAC 48.330(a)). Each proposed tariff sheet includes the name of the company, ACS-AN's certificate of public convenience and necessity number, the proposed tariff advice number, tariff sheet number and tariff sheet revision number (*see* 3 AAC 53.243(e)(2)).

The requirements of 3 AAC 48.270 are not applicable to this filing as there is no dominant carrier in in the ACS-AN study area (*see* 3 AAC 53.243(a)). Pursuant to 3 AAC 53.243(d)(1), ACS-AN will publish a notice summarizing the proposed rule changes on its web site at <https://www.alaskacomcommunications.com/-/media/Files/Tariffs/Notice-of-Local-Tariff-Changes-112116.pdf> for at least 30 days after implementation. The notice includes a statement that TA557-120 is available for inspection at the Commission's office, that comments may be filed with the Commission and ACS-AN's contact information.



Without approval of the commission, and after compliance with the requirements of 3 AAC 53.243, a local exchange carrier may implement a change in general rules and regulations for local exchange service (*see* 3 AAC 53.243(c)(6)); therefore, ACS-AN requests that TA557-120 become effective upon filing.

If you have any questions, please feel free to email or call me.

Sincerely,

ACS OF ANCHORAGE, LLC

A handwritten signature in black ink, appearing to read "Lisa Phillips". The signature is fluid and cursive, with the first name "Lisa" being more prominent than the last name "Phillips".

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Attachments

ACS OF ANCHORAGE, LLC d/b/a ALASKA COMMUNICATIONS SYSTEMS,  
ALASKA COMMUNICATIONS, ACS LOCAL SERVICE, AND ACS

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SERVICES

4.1


SERVICES INDEX

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Tariff Advice 557-120

Effective: July 14, 2017

Issued By: ACS OF ANCHORAGE, LLC

By:  Title: Manager, Regulatory Affairs  
Lisa Phillips

ACS OF ANCHORAGE, LLC d/b/a ALASKA COMMUNICATIONS SYSTEMS,  
ALASKA COMMUNICATIONS, ACS LOCAL SERVICE, AND ACS

4.2 LOCAL ACCESS


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4.2.5.1.2	Individual Business Simple Line	\$14.50	
4.2.5.1.3	Individual Business Complex Line	\$14.50	
4.2.5.2	TERMS AND CONDITIONS		
4.2.5.2.1	Telephone Number Reservation Service is provided to reserve a telephone number. The service does not reserve the underlying facilities associated with providing service.		
4.2.5.2.2	To activate a reserved telephone number, Section 4.6 Nonrecurring Charges apply.		

Tariff Advice 557-120

Effective: July 14, 2017

Issued By: ACS OF ANCHORAGE, LLC

By:   
Lisa Phillips

Title: Manager, Regulatory Affairs

RCA NO. 120  
Canceling:

Second Revision  
First Revision

Sheet No.  
Sheet No.

4.5  
4.5

ACS OF ANCHORAGE, LLC d/b/a ALASKA COMMUNICATIONS SYSTEMS,  
ALASKA COMMUNICATIONS, ACS LOCAL SERVICE, AND ACS

4.2

LOCAL ACCESS

4.2.1

RESIDENTIAL

Monthly  
Rate

4.2.1.1 RATES

4.2.1.1.1 Individual Residence Line

\$19.00

(l)

4.2.1.1.2 Modem Line – Per Line

\$18.60

4.2.1.2 TERMS AND CONDITIONS

4.2.1.2.1 Residence service is a local access service provided to an individual at their place of residence where the actual or obvious use of the service is for social or domestic purposes.

4.2.1.2.2 Modem Line service provides a line that falls within the following specified parameters: the loop resistance for a Modem Line will be less than 1200 ohms, and the longitudinal balance will be not less than 60 decibels. Modem Line requires that the inside wire be connected to a single jack; the jack that the CPE is connected. Except as otherwise noted, terms and conditions applicable to Residential service as specified elsewhere in this tariff will apply to Modem Line.

4.2.1.2.3 All rates are in dollars and cents per month, except as otherwise stated.

4.2.1.2.4 These charges are in addition to the appropriate charges as specified in Sections 4.6 and 4.12.


4.2.1.2.5 Rates in Section 4.2.1.1 apply for the Begich-Boggs Visitor Center and the Glacier Valley Lodge in the Portage area.

4.2.1.2.6 The areas served by ACS of Anchorage, LLC are defined in Section 6, Certificated Serving Area.

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