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VIA ELECTRONIC FILING

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

**Re: Special Access Rates for Price Cap Local Exchange Carriers; AT&T Corporation
Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange
Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-
10593**

Dear Ms. Dortch:

By this letter, General Communication, Inc. (GCI) (FRN 0001570951) informs the Commission that one of GCI's subsidiaries separately submitted a response to the Commission's special access data collection in the above-captioned proceeding, as set forth below.

United Utilities, Inc. (FRN 0001571561)

Also, please find below public versions of GCI's essay responses to Questions II.A.8, II.A.10, II.A.11 Part 2, II.A.18, II.A.19, II.D.1, and II.D.2 of the special access data collection.¹ GCI is continuing to work with Commission staff to resolve certain minor technical issues with GCI's filing.

Please contact me with any questions.

¹ Pursuant to the protective order in this proceeding, GCI's "[d]ata containers submitted to the Commission in response to the Data Collection through the Special Access Web Portal are presumed to contain Highly Confidential Data described in Appendix B and will be treated accordingly." *See Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Protective Order, WC Docket No. 05-25; RM-10593, at App. A para. 3 (WCB 2014), http://transition.fcc.gov/Daily_Releases/Daily_Business/2014/db1001/DA-14-1424A1.pdf. "Submitting Parties do not need to submit via ECFS redacted versions of documents or data containers containing Highly Confidential Data submitted to the Special Access Web Portal." *See id.* at para 22.

Sincerely,

Tim Stelzig (Eem)

Tim Stelzig
Federal Regulatory Attorney

cc: SPADCO outreach@fcc.gov
Deena Shetler
Billy Layton

GCI II.A.5

Section II.A.5: Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

Response:

REDACTED

II.A.8. Explain your business rule(s) used to determine whether to build a Connection to a particular Location. Provide underlying assumptions.

a. Describe the business rules and other factors that determine where you build your Connections. Examples of such rules/factors are minimum Term Commitments or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a Connection to an otherwise suitable Location. These could be factors that are under your control or those that are not.

Response: GCI determines where to build Connections based on a variety of factors, primarily including revenue potential, cost, cost avoidance, and the specific needs of our customers. Consequently, stable buyers willing to make longer Term Commitments or commit to higher minimum capacity commitments can incent deployment, as can short build distances from the customer's building to GCI's core network. Factors that might prevent GCI from building a Connection to an otherwise suitable Location could include environmental obstacles – whether terrain or inability to obtain regulatory approval in a timely manner, lack of access to rights-of-way (public or private), and inability to obtain collocation, interconnection, or unbundled network facilities from the ILEC. In price cap areas where the ILEC holds a rural exemption from the requirement to negotiate interconnection, allow collocation, and to provide UNEs, if GCI is unable to achieve cost avoidance by self-providing facilities between the ILEC central office and GCI's Node, the business case for deploying Connection facilities may be adversely affected. The cost effectiveness of deploying construction crews and equipment to an area depends on avoiding cost of ILEC-provided inter-Nodal transport as well as Connection cost avoidance; the inability to realize cost savings through collocating and interconnecting at the ILEC office makes it less effective to construct facilities that could also provide Connections.

b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.

Response: Business density is an indirect factor in GCI's determination of where to build Connections because GCI's revenue expectations are generally higher in denser areas due to higher potential demand.

c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy Connections, and where you generally have experienced or currently experience serious difficulties in deploying Connections, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

Response: GCI has been most successful building Connections in Anchorage, which is the community in Alaska with the largest addressable market for Dedicated Services and where GCI has extensive network deployment, and to a lesser degree, Fairbanks and Juneau. In addition to more network deployment and higher population density, these areas do not hold rural exemption from the requirement to interconnect and to allow collocation. Price cap areas where GCI lacks extensive network facilities and population is less dense are more challenging for GCI to serve. Additionally, the non-Anchorage/Fairbanks/Juneau price cap areas are classified as rural and are thus exempt from UNE and interconnection requirements; this factor can reduce the usability of network deployments in the area, reducing the potential revenue as well as expected cost avoidance. Of course, there are many rate-of-return areas in Alaska that pose unique challenges for GCI to construct Connections due to lack of roads, lack of an intertied power grid, harsh environmental conditions, environmental permitting challenges, and many other factors.

II.A.10. Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Service over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

Response: General Communication, Inc.'s only advertising for Special Access is via our website: <http://www.gci.com/business/products/internet/dedicated-internet>.

Not Applicable

II.A.18. If you offer Dedicated Services pursuant to an agreement or Tariff that contains either a Prior Purchase-Based Commitment or a Non-Rate Benefit, then explain how, if at all, those sales are distinguishable from similarly structured ILEC sales of DS1s, DS3s, and/or PBDS.

Response: GCI's tariffed rates match the ILEC's rates.

II.A.19. Provide the business justification for the Term or Volume Commitments associated with any Tariff or agreement you offer or have in effect with a customer for the sale of Dedicated Services.

Response: Not applicable.

II.D.1. Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

***Response: The only advertising for special access is via GCI's website:
<http://www.gci.com/business/products/internet/dedicated-internet>. GCI's geographic scope is the State of Alaska. GCI does not target any particular type of customer.***

II.D.2. Identify where your company's policies are recorded on the following Dedicated Service-related processes: (a) initiation of service; (b) service Upgrades; and (c) service Disconnections. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a Tariff, provide the specific Tariff section(s). If these policies are recorded in documents other than Tariffs, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response: Rates for special access are contained in section 18.3 of GCI's Interstate Access Tariff. GCI's policy concerning non-rate terms and conditions for special access service are contained in section 7 of GCI's Interstate Access Tariff. GCI's Interstate Access Tariff is publicly available on-line at <http://www.gci.com/regulatory/interstate-access-tariff>.