



Certification of Ruth Willard

Connect America Fund, WC Docket Nos. 10-90

On March 26, 2015, Alaska Communications Systems, on behalf of its operating local exchange carriers ("ACS"), through counsel, gave notice to the FCC that ACS intends to deploy CAF-qualifying broadband to certain census blocks not identified by ACS at the time of its initial election of CAF Phase I incremental support. That notice was copied to USAC, the Regulatory Commission of Alaska, and the Native Village of Akhiok, in compliance with FCC's rule Section 54.312(c)(4).

On behalf of ACS I hereby certify that none of the additional locations to which ACS intends to deploy broadband using CAF Phase I incremental support are shown on the current National Broadband Map as "served" by any fixed broadband provider and, to the best of ACS's knowledge, these locations are in fact unserved by fixed broadband within the meaning of the Commission's rules.

On behalf of ACS I hereby certify that no plans to complete broadband deployment to any of these locations in the next three years have been included in ACS's capital improvement plans to date, nor is ACS compelled to complete this deployment by any merger commitment or similar regulatory obligation.

On behalf of ACS I hereby certify that ACS has undertaken due diligence to determine that the locations in question are not within the service area of either Broadband Initiatives Program or Broadband Technology Opportunities Program projects that will provide access to Internet capability with speeds of at least 3 Mbps downstream and 768 kbps upstream.

This certification is true and complete to the best of my information, knowledge and belief.

Date: May 27, 2015

Signed:

A handwritten signature in black ink, appearing to read "Ruth Willard", written over a horizontal line.

Ruth Willard
Senior Director, Revenue Management
Alaska Communications Systems