

Law Offices

1500 K Street N.W.
Suite 1100
Washington, DC
20005-1209

202-842-8800
202-842-8465 fax
www.dbr.com

PHILADELPHIA
WASHINGTON
BERWYN
NEW YORK
LOS ANGELES
SAN FRANCISCO

DrinkerBiddle&Shanley LLP
PRINCETON
FLORHAM PARK

April 9, 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

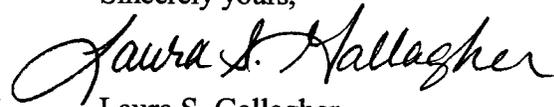
**RE: General Communication, Inc.
Cable Landing License Modification – Request to Add Pro Forma
Condition**

Dear Mr. Caton:

Pursuant to the Public Notice released by the Federal Communications Commission on March 13, 2002, General Communications, Inc. ("GCI") hereby submits an application to modify its cable landing license. Specifically, GCI requests that the "Pro Forma Condition" adopted by the Commission in the recent Cable Landing License Order be added to GCI's existing license.

An original and four (4) copies of this application are enclosed. Please also find enclosed an additional copy to be date-stamped.

Sincerely yours,



Laura S. Gallagher
Counsel for General Communication,
Inc.

cc: Donald Abelson, Chief, International Bureau

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

In the Matter of)
)
Cable Landing License Modification --) IB Docket No. 00-106
Request to Add Pro Forma Condition)
)

**APPLICATION OF GENERAL COMMUNICATION, INC. TO
MODIFY CABLE LANDING LICENSE**

General Communication, Inc. ("GCI"), by its undersigned counsel, hereby submits its application to modify its cable landing license. In particular, GCI requests that the "Pro Forma Condition" adopted by the Federal Communications Commission in the recent Cable Landing License Order¹ be added to its existing license. In support of this application GCI submits the following information:

Cable Landing License Information

Name of Licensee: General Communication Incorporated²

File Number: SCL-LIC-19961205-00615³

¹ Review of Commission Consideration of Applications under the Cable Landing License Act, Report and Order, 16 FCC Rcd 22167 (2001).

² The FCC license lists "General Communication Incorporated" as the licensee. However, the actual name of the licensee is "General Communication, Inc."

³ On June 2, 1998, pursuant to Section 1.767(a)(5) of the Commission's rules and the condition contained in Paragraph 40(4) of its cable landing license (12 FCC Rcd 18292 (1997)), General Communication, Inc. notified the Commission of the precise locations at which the Alaska United Cable System ("Alaska United") will land at Juneau, Whitter and Valdez, Alaska and at Seattle, Washington. The File No. for that notification is SCL-LIC-1998060200008.

List of All Licensees

General Communication Incorporated

New “Pro Forma” Rule

47 C.F.R. § 1.767(g)(7). The new rule permits post-transaction notification of pro forma assignments and transfers of control of interests in submarine cable landing licenses.

Acceptance of Rule Provisions

GCI hereby accepts and will abide by the provisions of the new pro forma rule (47 C.F.R. § 1.767(g)(7)), which reads as follows:

A pro forma assignee or a person or company that is the subject of a pro forma transfer of control of a cable landing license is not required to seek prior approval for the pro forma transaction. A pro forma assignee or person or company that is the subject of a pro forma transfer of control must notify the Secretary, Federal Communications Commission, Washington, D. C. 20554, with a copy to the Chief, International Bureau, Federal Communications Commission, no later than thirty (30) days after the assignment or transfer of control is consummated. The notification may be in the form of a letter (in duplicate to the Secretary), and it must contain a certification that the assignment or transfer of control was pro forma, as defined in § 63.24(a) of this chapter, and, together with all previous pro forma transactions, does not result in a change of the licensee’s ultimate control. A single letter may be filed for an assignment or transfer of control of more than one license issued in the name of a licensee if each license is identified by the file number under which it was granted.

Respectfully submitted,

**GCI COMMUNICATION CORP. d/b/a
GENERAL COMMUNICATION, INC. d/b/a GCI**



Richard Dowling
Senior Vice President, Corporate Development
2550 Denali Street, Suite 1000
Anchorage, Alaska 99503
(907) 868-6561
(907) 265-5676 FAX

Laura S. Gallagher
DRINKER BIDDLE & REATH LLP
1500 K Street, N.W., Suite 1100
Washington, D.C. 20005
(202) 842-8812
(202) 842-8465 FAX

Its Counsel

Dated: April 9, 2002

CERTIFICATE OF SERVICE

I, Colleen A. Mulholland, hereby certify that the foregoing Application of General Communication, Inc. was served this 9th day of April, 2002, by electronic filing and first class mail addressed to:

William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Donald Abelson
Chief, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554


Colleen A. Mulholland