GCI Presentation – Triennial Review
January 23, 2002

- **No exemption or special forbearance from 251(c) is justified for Alaska.**
    - **ACS Telephone Operating Co. revenue has increased since 1999. ACS is losing money in internet, LD and wireless.**
    - **Even in Anchorage, over 93% of GCI's customer lines traverse some part of ACS' loops (i.e. less than 7% is entirely over GCI facilities).**
- **Evaluating impairment for switching – careful definition of "wire center" is necessary.**
    - **Loops served by non-GR-303 capable IDLCs and other remote concentrators cannot be unbundled at the ILEC central office.**
    - **Juneau – 52% of loops cannot be unbundled at Juneau CO.**
    - **Fairbanks – 29% of loops cannot be unbundled at Fairbanks CO or other existing GCI collocation sites.**
    - **Any "wire center" density test for switch impairment must *exclude* all lines that cannot be unbundled at the "wire center," and loops that are not "unbundlable" at the wire center are impaired as to switching and shared transport.**
- **Promoting facilities based-entry requires performance measures and self-executing remedies (including liquidated damages).**
    - **Liquidated damages must be sufficient to disgorge ILEC gains from discrimination.**