

April 26, 2004

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

RE: WC Docket No. 04-159

Dear Secretary Dortch:

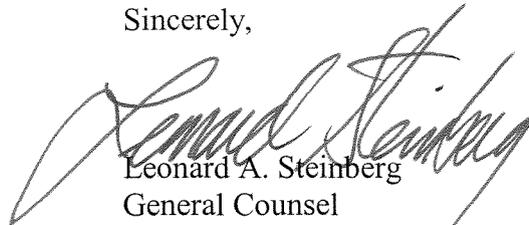
This letter is to provide the Commission with a further description of how the application for transfer of control over domestic Section 214 authorizations which is the subject of this docket qualifies for streamlined treatment pursuant to Section 63.03(b)(2)(iii) of the Commission's Rules.

Section 63.03(b)(2)(iii) provides for streamlined treatment of an application for transfer of control over a domestic 214 authorization if (a) the transferee will have a market share in the interstate, interexchange market of less than 10 percent, (b) the transferee would provide competitive telephone exchange services or exchange access services (if at all) exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction, and (c) applicants are incumbent independent local exchange carriers that have fewer than two percent of the nation's subscriber lines installed in the aggregate nationwide, and no overlapping or adjacent service areas.

Alaska Communications Systems Group, Inc.'s ("ACS") market share of national interstate, interexchange services will, following the transaction, be less than 1%. ACS does not currently provide competitive telephone exchange services or exchange access services. ACS has fewer than two percent of the nation's subscriber lines installed and no overlapping or adjacent service areas are implicated by the subject transaction. Therefore, the conditions of Section 63.03(b)(2)(iii) are met and the application qualifies for streamlined treatment under the Commission's Rules.

Please contact me with any questions or further requests for information.

Sincerely,



Leonard A. Steinberg
General Counsel
Alaska Communications Systems Group, Inc.