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July 22, 2004

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-325
Washington, DC 20554

Re: CC Docket No. 00-46, CC Docket No. 95-182

Dear Ms. Dortch:

Today, Mark Vasconi, Charlie Naftalin and I, representing AT&T ALASCOM, met with Julie Saulnier, Deena Shetler, Gail Cohen, Bill Kehoe, Ann Stevens and Christi Shewman of the Wireline Competition Bureau to discuss AT&T ALASCOM's positions in the above referenced Dockets. The attachment, which was a handout at the meeting, provides the details of that discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "M Del Casino".

Attachment

cc: June Saulnier
Deena Shetler
Gail Cohen
Bill Kehoe
Ann Stevens
Christi Shewman

- AT&T Alascom Regulatory History
- Current Circumstances
 - GCI has demonstrated its ability to provide data and voice service to any location it desires
 - AT&T Alascom's revenues have dropped dramatically since '95 while GCI's have risen
 - AT&T Alascom's revenues have dropped from ~\$320M in '95 to ~\$232M in '03 (\$94M are from intra-company, non-cash transactions)
 - GC's revenues have increased from \$129M to \$390M (\$204M from LD operations)
 - GCI owns facilities that reach at least 92% of all access lines in Alaska
 - GCI has an extensive VSAT network that selectively serves high-value data customers in Bush Alaska
 - GCI's facilities and ability to build prove that AT&T Alascom has no market power
- Tariff 11 Relief
 - GCI has a vested interest in continuing Tariff 11
 - Tariff 11 places an umbrella under which GCI is able to price services to MCI and Sprint
 - GCI 2003 OCC revenues are \$91.7M (44.8% of LD revenues and 23% of consolidated revenue)
 - Other alternatives exist to providing OCCs and resellers service
 - Special contracts are currently being used and volumes are substantially higher than on Tariff 11
- Relief from Separate Corporate Subsidiary
 - Separate subsidiary requirements complicate ability to introduce services to Alaska
- Relief for Separate Tariff Obligations
 - Confusing to end users in Lower-48 wishing to use AT&T services
- Relief from Affiliate Transaction Rules
 - Compliance adds costs and inefficiencies