

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

|                                |   |                      |
|--------------------------------|---|----------------------|
| In the Matter of               | ) |                      |
|                                | ) |                      |
| Investigation of ALASCOM, INC. | ) | CC Docket No. 95-182 |
| Tariff FCC No. 11              | ) |                      |

**REQUEST FOR EXTENSION OF TIME**

General Communication, Inc. (“GCI”), by its undersigned counsel, hereby requests an extension of time for the filing of oppositions to the Alascom direct case in the captioned proceeding, from October 5, 2004 to October 13, 2004. In turn, the reply date would be extended from October 12, 2004 to October 20, 2004. Counsel for Alascom and ACS-LD have been advised of GCI’s proposed change in schedule and have indicated neither consent nor opposition at the time of filing.

The instant tariff investigation has been pending since 1995. GCI has been and remains a strong proponent of conducting and concluding the investigation. Now that the Bureau has activated the investigation, GCI has had its first opportunity to study the model Alascom created to produce its annual Tariff 11 rates, as populated and run by Alascom four different times during the last eight years.<sup>1</sup> Having finally been afforded access to the revenue requirement and rate development methodology and inputs for the selected years, it is critical that interested

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<sup>1</sup> The Bureau directed Alascom to file the CAP model used to develop 1996 rates, 1999 rates, and 2001 rates. Investigation of Alascom, Inc. Interstate Transport and Switching Services Tariff FCC No. 11, CC Docket No. 95-182, Order Designating Issues for Investigation, DA 04-2349 (rel. July 30, 2004). Alascom also provided the CAP model to develop 1996 initial rates.

parties have an adequate opportunity to analyze the data, to ensure that “the public interest is best served by careful scrutiny of the CAP and its functioning through the tariff review process.”<sup>2</sup>

Counsel to GCI received the Alascom data on August 30, 2004. In analyzing the data since that time, GCI has encountered a number of issues that require additional time to prepare and file its opposition. The first issue encountered was the software used by the model. The files are in Lotus, a program rarely in use today, and no longer equipped on GCI’s analysts’ computers. GCI had to reacquisition and install the program before it could work with the data. This is because converting the files to Excel causes some of the data entries to be replaced with “n/a”.

The 25 files provided total 242 megabytes of data. By any measure, this is a large amount of data to handle – first, to understand the model operations and interrelations (or lack thereof), and second, to analyze inputs and outputs for accuracy, relationships, and trends from model year to model year. Moreover, the Cost Allocation Plan (“CAP”) – effectively a cost allocation manual that describes basic principles for allocating costs between bush and non-bush areas – does not address changes in accounting procedures or adjustment sin the model over the years. This information has to be analyzed from model to model. Finally, because the Bureau has not yet required Alascom to provide the model for each year, it has been more difficult to try to assess the validity of the projected investment and expense data that Alascom developed outside the model each year for input into the jurisdictional separations phase.

GCI recognizes that when assessing Alascom’s request for an extension of time to file its direct case, the Bureau balanced the public interest in a “thorough and complete record” with the

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<sup>2</sup> Alascom, Inc., Tariff FCC No. 11, Petition for Waiver of Annual Filing Requirement, Order, DA 03-2649 at ¶ 30 (rel. Aug. 13, 2003) (“Waiver Petition Order”).

public interest in “the completion of this investigation.”<sup>3</sup> With this in mind, and given GCI’s own interest in competing the investigation, GCI seeks as short of an extension<sup>4</sup> it believes is needed to effectively analyze the data provided to date and to adequately participate in the proceeding.<sup>5</sup>

For these reasons, GCI respectfully requests an extension of time, until October 13, 2004, for oppositions to be filed in the proceeding, and until October 21, 2004 for replies.

Respectfully submitted,

GENERAL COMMUNICATION, INC.

/s/

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September 30, 2004

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<sup>3</sup> Investigation of Alascom, Inc. Interstate Transport and Switching Services Tariff FCC No. 11, CC Docket No. 95-182, Order Extending Pleading Cycle, DA 04-2679 (Aug. 25, 2004).

<sup>4</sup> The time period requested takes into account that Monday, October 11 is a federal holiday (Columbus Day).

<sup>5</sup> GCI notes, however, models from additional years may still be needed, for example, to calculate damages. See Order Designating Issues for Investigation at n.46.

## CERTIFICATE OF SERVICE

I, Colleen A. Mulholland, do hereby certify that a copy of the foregoing Request for Extension of Time was sent via electronic mail to the addresses indicated below this 30<sup>th</sup> day of September, 2004, to the following:

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Colleen A. Mulholland