

1
2 **QUESTION 21**

3 21) For each task identified in part (c)(i) of the previous question, please
4 provide the following information:

- 5 a) the average time you estimate it takes to complete the task; and
6 b) the typical occurrence of the task during the process.

7 **Response:** See Exhibit GCI-5, attached hereto.

8 **QUESTION 22**

9 22) Non-incumbent carriers only: Please provide a list of all the ACS-AK,
10 ACS-AN and ACS-F wire centers identified by name, address, and CLLI code,
11 to which you provide or offer transport facilities (*i.e.*, any facilities that, directly
or indirectly, provide connections to wire centers) to other carriers. For each
facility, please identify:

- 12 a) The type of transport facility (*i.e.*, DS1, DS3, dark fiber);
13 b) The transport technology used (*e.g.*, fiber optic (dark or lit),
microwave, radio, or coaxial cable);
14 c) The level of capacity the facility is capable of supporting.

15 **Response:** GCI is collocated at seven ACS-designated wire centers in
16 Anchorage, two in Fairbanks, and two in Juneau. At each of these sites, GCI
17 has deployed fiber facilities that are capable of supplying transport to other
18 carriers, such as the high-capacity transport offered by GCI in both its interstate
and intrastate tariffs. See also Exhibit GCI-6 (attached hereto) for specific
19 responses to subparts a, b, and c.

20 **QUESTION 23**

21 23) Non-incumbent carriers only: Please provide a list of all transport
22 facilities (*i.e.*, trunks) that you connect either directly or indirectly between any
two ACS central offices, that you own, control or lease or have obtained use
from an entity other than ACS. For each facility, please identify:

- 23 a) The A (beginning) location, the Z (ending) location, and any other
24 premises through which the facility is routed;
25 b) The wire center in which the facility is located, by CLLI code (if wire
center data is unavailable please report the data by city);
26

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2550 Denali Street, Suite 1000
Anchorage, AK 99503
(907) 265-5600

- 1
2 c) The type of transport facility (*i.e.*, DS1, DS3, dark fiber);
3 d) The transport technology used (*e.g.*, fiber optic (dark or lit),
4 microwave, radio, or coaxial cable);
5 e) The level of capacity the facility is capable of supporting.

6 **Response:** See Exhibit GCI-7 (attached hereto) for subparts (a), (b), and (c).

- 7 d) The transport technology used over each route is lit fiber optic.
8
9 e) The type of transport facility provided on the exhibit also is effectively
10 the maximum level of capacity the facility is capable of supporting. Typically,
11 capacity over an OCx facility as these would be utilized as DS1s and DS3s, and
12 in the case of OC12 or above, OC3s.

13 **QUESTION 24**

14 24) Non-incumbent local carriers only: Please list all the end points to all
15 high capacity loops and dark fiber loops in the ACS-AN, ACS-F and ACS-AK
16 service areas that you own or control and that could be available for the
17 provision of service comparable to UNE DS3 or dark fiber loop services.
18 Indicate whether limitations may exist for availability of these loops as a
19 replacement for the incumbent's unbundled network element DS3 and dark
20 fiber services.

21 **Response:** See Exhibit GCI-8 (attached hereto). GCI is not currently aware of
22 any limitations with respect to the identified facilities that would affect their use
23 as a replacement for the incumbent's unbundled network element DS3 and/or
24 dark fiber services, as available at each of the customer locations listed in
25 Exhibit GCI-8.

26 **Dated** March 19, 2004 at Anchorage, Alaska.

27 Respectfully submitted,

By: Tina Pidgeon by MMW
Tina Pidgeon
Vice President, Federal Regulatory Affairs

By: Martin Weinstein
Martin M. Weinstein
Regulatory Counsel

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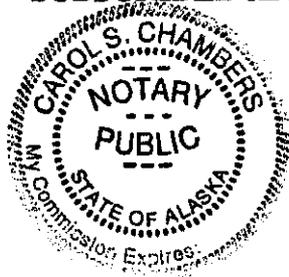
VERIFICATION

I, Martin Weinstein, verify that I believe the statements contained in this pleading are true and accurate.

Martin Weinstein

Martin M. Weinstein

SUBSCRIBED AND SWORN to before me this 19 day of March 2004.



Carol Chambers

Notary Public in and for Alaska

My commission expires: 4-2-05

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EXHIBIT GCI-1

Physical Collocation – Typical Task List

1. **Application for Collocation**
 - a. Submit Check Request for Application Fee
 - b. Submit Request for Collocation to ILEC
 - c. ILEC Approves Request / Names Single Point Of Contact
2. **Pre-construction Site Survey**
 - a. Request Site Survey
 - b. Schedule Site Survey, Travel Arrangements to site location
 - c. Conduct Site Survey/Take field notes
3. **Detailed Site Requirements**
 - a. Develop Site Requirements (drawings of site/preliminary engineering drawings and narrative)
 - b. Submit Requirements to ILEC
 - c. ILEC Approval of Site Requirements (potentially iterative process)
4. **Cost Proposal - ILEC Space**
 - a. Cost Proposal Development
 - b. Cost / Schedule Review & Negotiation
 - c. Cost / Schedule Approval
5. **Cost Proposal - Collocation Space**
 - a. Architect's Design
 - b. Submit Design to Contractors for Bids
 - c. Receive/Review Contractor's Bids
 - d. Award Contracts for Work
6. **Collocation Space Preparation (ILEC)**
 - a. Obtain Construction Permits
 - b. Order Building Materials, HVAC equipment, Fire Suppression Equipment
 - c. Demolition/Asbestos Abatement
 - d. Framing
 - e. Plumbing
 - f. Electrical & Lighting
 - g. HVAC
 - h. Fire Suppression
 - i. Construct Duct System for Entrance Cables
 - j. Sheetrock/Taping/Painting
 - k. Anti-static Flooring
 - l. Space Acceptance
7. **ILEC Space Preparation**
 - a. Order Ironwork, MDF Blocks, DSX Panels, etc.
 - b. Materials Delivery
 - c. Install MDF Blocks
 - d. Install DS-1 Panels & Modules
 - e. Install DS-3 Panels & Modules
 - f. Install VF Tie Cables
 - g. Install DS-1 Tie Cables
 - h. Install DS-3 Tie Cables
 - i. Terminate VF Tie Cables
 - j. Terminate DS-1 Tie Cables
 - k. Terminate DS-3 Tie Cables

EXHIBIT GCI-1

I. ILEC Space Complete

8. Outside Plant

- a. Submit Outside Plant Request For Fiber Entrance Facility
- b. Determine Route for Fiber Entrance Facility
- c. Order Fiber Cable
- d. Fiber Cable Delivery
- e. Order InnerDuct
- f. InnerDuct Delivery

9. Material Requisitions

- a. Order Cable Rack
- b. Cable Rack Delivery
- c. Order Relay Racks
- d. Relay Rack Delivery
- e. Order MDF
- f. MDF Delivery
- g. Order MDF Blocks
- h. MDF Blocks Delivery
- i. Order Test Shoe (to test cable pairs not connected to switch)
- j. Test Shoe Delivery
- k. Order DS-1 Panels and Modules
- l. DS-1 Panel / Module Delivery
- m. Order DS-3 Panel and Modules
- n. DS-3 Panel / Module Delivery
- o. Order Fiber Termination Panel
- p. FTP Delivery
- q. Order Fuse Panels
- r. Fuse Panel Delivery
- s. Obtain Quotations for Rectifiers (AC-DC converter) and Batteries
- t. Order Rectifiers
- u. Rectifier Delivery
- v. Order Batteries
- w. Battery Delivery
- x. Order Power Cable and Lugs
- y. Cable and Lugs Delivery
- z. Order Monitor & Control Equipment
- aa. M&C Equipment Delivery
- bb. Order Harris 107 RTU
- cc. Harris 107 Delivery
- dd. Obtain Quotation for Transport Equipment
- ee. Order Transport Equipment
- ff. Transport Equipment Delivery
- gg. Obtain Quotation for DLC Equipment
- hh. Order DLC Equipment
- ii. DLC Equipment Delivery
- jj. Obtain Quotation for PairGain Equipment
- kk. Order PairGain Equipment
- ll. PairGain Equipment Delivery

10. Installation Packages

- a. Issue Install Package for Cable Rack, Relay Rack, MDF, Fuse Panels
- b. Issue Install Package for DS-1 & DS-3 Panels, Harris 107 RTU
- c. Issue Install Package for Rectifier and Batteries
- d. Issue Install Package for M&C Equipment
- e. Issue Install Package for Transport Equipment

EXHIBIT GCI-1

- f. Issue Install Package for DLC Equipment
- g. Issue Install Package for PairGain Equipment

11. Circuit Orders

- a. Submit Orders for DLC GR-303 Group
- b. Submit Orders for PairGain GR-303 Group
- c. Design DLC GR-303 Group
- d. Design PairGain GR-303 Group
- e. Order 4 POTS Lines for Harris 107 Unit
- f. Order 1 POTS Line for Test Shoe
- g. Order 1 POTS Line for Site Telephone

12. Miscellaneous Activity

- a. Issue Application Package to Office Equipment List with Tie Pairs to Local Services Delivery Dept. (LSDD)
- b. Issue PairGain OE List with Tie Pairs to LSDD
- c. Issue Jumper Running List for DLC Equipment
- d. Issue Jumper Running List for PairGain Equipment

13. Installation Activity

- a. Install Cable Rack and Relay Racks
- b. Install MDF
- c. Install Fuse Panels
- d. Install DSX-1 and DSX-3 Panels and Modules
- e. Install Power Cable Runs
- f. Install Rectifier
- g. Install Batteries
- h. Install M&C Equipment
- i. Install Transport Equipment, Terminate on DSX-1 & DSX-3 Panels
- j. Install DLC Equipment, Terminate DSX-1 and VF Cables
- k. Install PairGain Equipment, Terminate DSX-1 and VF Cables
- l. Install Harris 107 RTU
- m. Install Test Shoe
- n. Splice Tip Cables to VF Tie Cables
- o. Terminate DS-1 Tie Cables on DSX-1 Panels
- p. Terminate DS-3 Tie Cables on DSX-3 Panels
- q. Test VF Tie Cables
- r. Test DS-1 Tie Cables
- s. Test DS-3 Tie Cables
- t. Install InnerDuct and Fiber Cable
- u. Test Fiber and Record Results
- v. Provide Fiber Assignments to Transport Engineering
- w. Turn-Up DC Power Plant
- x. Power Up Equipment
- y. Perform System Tests on Transport Equipment
- z. Place Transport Equipment In Service
- aa. Provision DLC Equipment
- bb. Provision PairGain Equipment
- cc. Provision Transport Equipment
- dd. Run Jumpers for DLC Equipment
- ee. Run Jumpers for PairGain Equipment
- ff. Turn Up GR-303 Group for DLC Equipment
- gg. Turn-Up GR-303 Group for PairGain Equipment
- hh. Run Jumpers to Harris 107 Unit
- ii. Grow DLCs in Harris Test System (add lines for testing)
- jj. Run Jumper for Test Shoe

EXHIBIT GCI-1

- kk. Verify M&C Alarms are Functioning Properly
- ll. Site Acceptance by Operations

EXHIBIT GCI-2

Adjacent Collocation – Typical Task List

1. **Application for Collocation**
 - a. Submit Check Request for Application Fee
 - b. Submit Request for Collocation to ILEC
 - c. ILEC Approves Request / Names Single Point Of Contact
2. **Pre-construction Site Survey**
 - a. Request Site Survey
 - b. Schedule Site Survey, Travel Arrangements to site location
 - c. Conduct Site Survey/Take field notes
3. **Detailed Site Requirements**
 - a. Develop Site Requirements (drawings of site/preliminary engineering drawings and narrative)
 - b. Submit Requirements to ILEC
 - c. ILEC Approval of Site Requirements (potentially iterative process)
4. **Cost Proposal - ILEC Space**
 - a. Cost Proposal Development
 - b. Cost / Schedule Review & Negotiation
 - c. Cost / Schedule Approval
5. **ILEC Space Preparation**
 - a. Order Ironwork, MDF Blocks, DSX Panels, etc.
 - b. Materials Delivery
 - c. Install MDF Blocks
 - d. Install DS-1 Panels & Modules
 - e. Install DS-3 Panels & Modules
 - f. Install VF Tie Cables
 - g. Install DS-1 Tie Cables
 - h. Install DS-3 Tie Cables
 - i. Terminate VF Tie Cables
 - j. Terminate DS-1 Tie Cables
 - k. Terminate DS-3 Tie Cables
 - l. Test VF Tie Cables
 - m. Test DS-1 Tie Cables
 - n. Test DS-3 Tie Cables
 - o. ILEC Space Complete
6. **CLEC Site Preparation**
 - a. Request List of Approved Contractors from ILEC
 - b. List of Approved Contractors Received
 - c. Obtain As-Built Survey of Property
 - d. Design Foundation / Footings for Shelter
 - e. Design Grounding System
 - f. Design Duct System for Tie Cables
 - g. Design Duct System for Fiber Entrance
 - h. Submit Designs to Contractors for Bids
 - i. Preparation of Bids
 - j. Review Bids for Conduit and Duct System
 - k. Select Contractor and Give Notice To Proceed
 - l. Order Materials, Prepare for Construction
 - m. Construct Duct Systems
 - n. Contractor Lays Foundation

EXHIBIT GCI-2

- o. Order Commercial Electrical Service To Site

7. Outside Plant

- a. Submit Outside Plant Request For Fiber Entrance Facility
- b. Determine Route for Fiber Entrance Facility
- c. Order Fiber Cable
- d. Fiber Cable Delivery
- e. Order InnerDuct
- f. InnerDuct Delivery

8. Collocation Shelter

- a. Design Shelter and Equipment Layout
- b. Order Shelter
- c. Shelter Construction and Delivery

9. Material Requisitions

- a. Order Cable Rack
- b. Cable Rack Delivery
- c. Order Relay Racks
- d. Relay Rack Delivery
- e. Order MDF
- f. MDF Delivery
- g. Order MDF Blocks
- h. MDF Blocks Delivery
- i. Order Test Shoe (to test cable pairs not connected to switch)
- j. Test Shoe Delivery
- k. Order DS-1 Panels and Modules
- l. DS-1 Panel / Module Delivery
- m. Order DS-3 Panel and Modules
- n. DS-3 Panel / Module Delivery
- o. Order Fiber Termination Panel
- p. FTP Delivery
- q. Order Fuse Panels
- r. Fuse Panel Delivery
- s. Obtain Quotations for Rectifiers and Batteries
- t. Order Rectifiers
- u. Rectifier Delivery
- v. Order Batteries
- w. Battery Delivery
- x. Order Power Cable and Lugs
- y. Cable and Lugs Delivery
- z. Order Monitor & Control Equipment
- aa. M&C Equipment Delivery
- bb. Order Harris 107 RTU
- cc. Harris 107 Delivery
- dd. Obtain Quotation for Transport Equipment
- ee. Order Transport Equipment
- ff. Transport Equipment Delivery
- gg. Obtain Quotation for DLC Equipment
- hh. Order DLC Equipment
- ii. DLC Equipment Delivery
- jj. Obtain Quotation for PairGain Equipment
- kk. Order PairGain Equipment
- ll. PairGain Equipment Delivery

EXHIBIT GCI-2

10. Installation Packages

- a. Issue Install Package for Cable Rack, Relay Rack, MDF, Fuse Panels
- b. Issue Install Package for DS-1 & DS-3 Panels, Harris 107 RTU
- c. Issue Install Package for Rectifier and Batteries
- d. Issue Install Package for M&C Equipment
- e. Issue Install Package for Transport Equipment
- f. Issue Install Package for DLC Equipment
- g. Issue Install Package for PairGain Equipment

11. Circuit Orders

- a. Submit Orders for DLC GR-303 Group
- b. Submit Orders for PairGain GR-303 Group
- c. Design DLC GR-303 Group
- d. Design PairGain GR-303 Group
- e. Order 4 POTS Lines for Harris 107 Unit
- f. Order 1 POTS Line for Test Shoe
- g. Order 1 POTS Line for Site Telephone

12. Miscellaneous Activity

- a. Issue Application Package to Office Equipment List with Tie Pairs to Local Services Delivery Dept. (LSDD)
- b. Issue PairGain OE List with Tie Pairs to LSDD
- c. Issue Jumper Running List for DLC Equipment
- d. Issue Jumper Running List for PairGain Equipment

13. Installation Activity – Anchorage (Pre-Construction of Shelter)

- a. Install Cable Rack and Relay Racks
- b. Install MDF
- c. Install Fuse Panels
- d. Install DSX-1 and DSX-3 Panels and Modules
- e. Install Power Cable Runs
- f. Install Rectifier
- g. Install Batteries
- h. Install M&C Equipment
- i. Install Transport Equipment, Terminate on DSX-1 & DSX-3 Panels
- j. Install DLC Equipment, Terminate VF Cables
- k. Install PairGain Equipment, Terminate VF Cables
- l. Install Harris 107 RTU
- m. Install Test Shoe
- n. Prepare Shelter for Shipping to Site
- o. Ship Shelter to Site

14. Installation Activity - On Site

- a. Set Shelter in Place on Foundation / Footings
- b. Seal Conduit / Duct System
- c. Make Connect from Ground Window to Ground System
- d. Connect Commercial Electrical Service
- e. Verify Lighting and HVAC Equipment Functions Properly
- f. Splice Tip Cables to Voice Frequency Tie Cables
- g. Terminate DS-1 Tie Cables on DSX-1 Panels
- h. Terminate DS-3 Tie Cables on DSX-3 Panels
- i. Test VF Tie Cables
- j. Test DS-1 Tie Cables
- k. Test DS-3 Tie Cables

EXHIBIT GCI-2

- l. Install InnerDuct and Fiber Cable
- m. Test Fiber and Record Results
- n. Provide Fiber Assignments to Transport Engineering
- o. Turn-Up DC Power Plant
- p. Power Up Equipment
- q. Perform System Tests on Transport Equipment
- r. Place Transport Equipment In Service
- s. Provision DLC Equipment
- t. Provision PairGain Equipment
- u. Provision Transport Equipment
- v. Run Jumpers for DLC Equipment
- w. Run Jumpers for PairGain Equipment
- x. Turn Up GR-303 Group for DLC Equipment
- y. Turn-Up GR-303 Group for PairGain Equipment
- z. Run Jumpers to Harris 107 Unit
- aa. Grow DLCs in Harris Test System (add lines for testing)
- bb. Run Jumper for Test Shoe
- cc. Verify M&C Alarms are Functioning Properly
- dd. Site Acceptance

Exhibit GCI-3

Adjacent Collocation Cost Estimate	Fairbanks		Juneau	
	Steese	Dale Road	Mendenhall	Lemon Creek
Engineer, Furnish, Install Cabinetized DLC Equipment	\$ 78,304	\$ 43,415	\$ 84,680	\$ 69,252
Environmentally Controlled Cabinet	\$ 36,613	\$ 18,118	\$ 37,935	\$ 25,933
Pad Mount Bracket	\$ 586	\$ 181	\$ 586	\$ 230
Maintenance & Control Equipment	\$ 14,027	\$ 14,027	\$ 14,027	\$ 14,027
Site Prep	\$ 20,000	\$ 17,500	\$ 20,000	\$ 20,000
Permits & Survey	\$ 1,500	\$ 1,500	\$ 1,500	\$ 1,500
Electrical Service	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000
Cabinet Placement	\$ 7,500	\$ 5,000	\$ 7,500	\$ 7,500
GCI Engineering/Project Management Labor	\$ 6,000	\$ 6,000	\$ 6,000	\$ 6,000
GCI Installation Labor	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000
ACS Collocation Application Fee	\$ 2,100	\$ 2,100	\$ 2,100	\$ 2,100
ACS Costs (Estimated by GCI)	\$ 25,000	\$ 12,000	\$ 25,000	\$ 25,000
Subtotal	\$ 201,630	\$ 129,841	\$ 209,328	\$ 181,542
Contingency (20%)	\$ 40,326	\$ 25,968	\$ 41,866	\$ 36,308
Total Cost	\$ 241,956	\$ 155,809	\$ 251,194	\$ 217,850

Note: First three items based on vendor quotations. All other costs are estimates.

These estimates do not include the cost to place fiber feeder facilities, but assume that the T-1 feeder circuits could be leased from ACS.

Steese 2,795 lines in service (approx.)
Dale Road 646 lines in service (approx.)
Mendenhall 3,119 lines in service (approx.)
Lemon Creek 2,271 line sin service (approx.)

EXHIBIT GCI-4

GCI Local Services Churn (as percentage)	Jan-03	Feb-03	Mar-03	Apr-03	May-03	Jun-03
Total Churn	2.3%	1.8%	2.1%	2.2%	1.8%	1.1%
Anchorage	2.1%	1.8%	2.0%	2.3%	1.7%	1.1%
Fairbanks	3.6%	2.0%	2.6%	2.2%	2.4%	1.5%
Juneau	2.4%	1.6%	1.7%	1.3%	1.2%	1.0%

Jul-03	Aug-03	Sep-03	Oct-03	Nov-03	Dec-03	Jan-04	Feb-04
1.6%	2.1%	1.8%	2.2%	2.0%	1.6%	1.5%	1.8%
1.6%	2.1%	1.6%	2.2%	1.9%	1.5%	1.4%	1.8%
1.9%	2.4%	3.3%	2.4%	2.4%	2.0%	1.8%	1.8%
1.2%	1.5%	1.8%	1.9%	2.3%	1.3%	1.5%	1.6%

EXHIBIT GCI-5

GCI PROPOSAL FOR COORDINATED BATCH "HOT CUTS"

GCI proposes that the following tasks be followed for every GCI order that requires moving customer loops from the ACS switch to the GCI switch. Overall, a comprehensive process will address the impairment that arises when loop cutovers are not handled in an orderly, coordinated fashion, as described in the Testimonies of Gina Borland (at 2-6) and M. Sue Keeling (at 2-7). This process must be followed for every line for which a hot cut is performed, but the coordination and notification will be simplified if undertaken in a "batch." The batch hot cut process is to commence once ACS has processed the GCI order, assigned a due date, and issued a "Firm Order Confirmation" ("FOC") to GCI.

ACS and GCI have agreed by contract that this order processing function is to take no longer than two business days from ACS' receipt of the order to the issuance of the FOC. This timeframe allows GCI to notify the customer of the due date, as well as coordinate the tasks required by the GCI technician to complete the order. Since this contractual requirement is in place (see, e.g., GCI/ACS Joint Motion, U-02-97, Exhibit A (filed Mar. 12, 2004)), this interval that precedes commencement of the batch hot cut process is not a change to the current process.

Question 20(c): On the assigned due date for a given order or group of orders, the following steps should be taken to swing a customer loop or loops at a given collocation site:

1. The ACS Technician calls the GCI technician to coordinate a set of lines to be converted from the ACS switch to the GCI switch at the relevant collocation site. This telephonic notice of the conversions to be performed should be provided no more than 30 minutes in advance of the work to be performed and should confirm telephone number and cable pair assignment for each line, as well as the sequential order in which ACS will provision each line in the batch.

EXHIBIT GCI-5

- Impairment issue to be addressed (Question 20): Required
coordination between ACS and GCI technicians will reduce the incidence of customer outages that can occur when a loop is moved between carrier switches without notice to and testing by the carrier "receiving" the line. Such outages are particularly difficult for the "receiving" carrier to detect when it does not know the line has been converted. Prior coordination is especially important for business conversions and move orders, so customer business operations will not be affected simply because they exercise their option to choose a new service provider. Moreover, notification that some lines will be worked is not useful unless it is accompanied by the identification of which specific lines will be worked. See Testimony of M. Sue Keeling (Keeling Testimony) at 9.
- Average estimated time to complete the task (Question 21(a)):
Assuming a maximum of ten lines per batch (as described below), GCI estimates that this task will take no longer than 15 minutes.
- New/existing task and estimated additional cost (Question 20(b), 21(b)): *Although this is not a new task (see Excerpt from Fairbanks/Juneau Operations Manual, "Conversion Requiring Jumper Swings", attached hereto as Exhibit GCI-5(a)), it is a step in the current process that is often missed and when performed, often lacks the order detail necessary. GCI does not anticipate*

EXHIBIT GCI-5

that performing this task will impose any additional costs on either party.

2. Upon contact and coordination (Task 1), the ACS Technician proceeds with the designated jumper swings.

- Impairment issue to be addressed (Question 20): *This completion of the jumper swing is fundamental to GCI's access to the customer loop via its own switching facilities.*
- Average estimated time to complete the task (Question 21(a)): *GCI estimates that this task will take no longer than three minutes per line.*
- New/existing task and estimated additional cost (Question 20(b) and 21(b)): *This is not a new task and will not impose any additional costs on either party.*

3. When the planned series of jumper swings and porting of the associated number are complete, the ACS technician provides the GCI technician notification by facsimile that the work has been completed and identifies the lines (by telephone number) for which the work was completed. This notification is to be provided immediately upon completion of all of the line swings in the batch and before the ACS technician departs the wire center. This task will permit GCI to confirm completion/service availability and immediately contact the ACS technician at the collocation site if a problem is detected

- Impairment issue to be addressed (Question 20): *Failure to perform this task often results in service interruption to the*

EXHIBIT GCI-5

customer since GCI is not aware ACS has completed its portion of the work. To report a deficient loop swing, ACS should allow direct communications between GCI and ACS wire center technicians and/or NOC technicians. In addition, ACS should notify GCI upon ACS' discovery of any order actions that could affect customer dial tone, features, or call receive/send capability. See Keeling Testimony at 10.

- *Average estimated time to complete the task (Question 21(a)):*
Assuming a maximum of ten loops per batch, ACS should provide the completion notification within 30 minutes of the initial coordination.
- *New/existing task and estimated additional cost (Question 20(b) and 21(b)):* *This is not a new task (see Excerpt from Fairbanks/Juneau Operations Manual, "Order Completion", attached hereto as Exhibit GCI-5(b)), but it is often omitted in practice. GCI does not anticipate that performing this task will impose any additional costs on either party.*

4. The GCI technician will test and validate the service to confirm the successful completion of the hot cut before ACS closes the service order. The loop provisioning will not be deemed "completed" until both ACS and GCI personnel have signed off on the order upon completion of their respective tasks. To meet this requirement, the ACS technician must remain at the collocation site until the

EXHIBIT GCI-5

GCI technician notifies the ACS technician that testing has been completed and service for each line is confirmed or 30 minutes, whichever comes first.

- Impairment issue to be addressed (Question 20): Under the current process, the ACS technician often leaves before GCI is aware that ACS has completed its work and without testing for service. As a result, customers suffer from unnecessary outages because the service confirmation step was not taken. In addition, once GCI is made aware (often by a customer call due to service interruption) and the hot cut process is considered "completed" by ACS, GCI has no way to contact the ACS technician if the 'cut' was faulty.
- Average estimated time to complete the task (Question 21(a)): This testing function can be completed at a rate of 5 minutes per loop.
- New/existing task and estimated additional cost (Question 20(b) and 21(b)): This task differs from the current process. GCI does not anticipate that this task will add any cost to the process, as any costs should be offset by the reduction of repeat collocation site visits to address customer outages caused by faulty hot cuts.

5. If either ACS or GCI determines that an order has not been successfully completed, then that order shall be included in the next immediate batch for the service area.

EXHIBIT GCI-5

- Impairment issue to be addressed (Question 20): This task is designed to minimize continued outages or incomplete provisioning.
- Average estimated time to complete the task (Question 21(a)): This task will not add any additional time to the process, but simply address the sequence in which incomplete orders will be reworked.
- New/existing task and estimated additional cost (Question 20(b) and 21(b)): This is a new task, but it is consistent with ACS' and GCI's recent agreement that any missed due date orders are to be given priority for rescheduling. No additional cost is estimated.

Question 20(a): In an effort to keep service interruptions to a minimum since the customers' service will be interrupted during the jumper swing, GCI proposes a maximum of 10 conversions (counted on a customer basis) to be performed in a batch. An exception to the maximum should apply for any single order having more than 10 lines. In this case, all the lines in the single order should be worked as a batch. See Borland Testimony at 6-7. This is a manageable number for the tasks identified herein and is reasonable given the data GCI has already provided concerning daily volumes of jumper swings. See Exhibit MSK-1. In addition, there should be no cap on the number of orders that may be worked in a day.

EXHIBIT GCI-5(a)

Conversions Requiring Jumper Swings

The conversion activity will proceed as follows:

- *The ACS Technician will call the designated CLEC "can be reached number" at the time agreed upon when the CLEC order was placed.*
- *The two technicians will agree on the first series of lines (A series of lines generally shall not exceed 5) to be converted.*
- *ACS will proceed with the jumper swings.*
- *ACS will advise the CLEC Technician when the series of jumper swings is complete and proceed with porting the numbers.*
- *Service interruptions for customers shall be consistent with the terms in the relevant interconnection agreement.*

Conversions Requiring Ports Only

Non-DID Port Only Numbers

The conversion activity will proceed as follows:

- *CLEC will contact the ACS NOC (611/564-1642) at the agreed upon time per the service order request to coordinate the port.*
- *ACS/CLEC technicians will agree on the first series of lines to be converted. A series in Port Only conversions generally shall be all of the telephone numbers identified on the service order.*
- *ACS will route the identified series of numbers to PODN in their switch.*
- *CLEC shall activate its SV to the NPAC and initiate its tests to validate that dial tone is established for the customer.*
- *Service interruptions for customers shall be consistent with the terms in the relevant interconnection agreement.*
- *CLEC will contact the ACS NOC @ 611/564-1642 when encountering problems on Port Only orders, failed notifications, or failed port.*

EXHIBIT GCI-5(a)

DID Port Only Numbers

The conversion activity will proceed as follows:

- *CLEC will contact the ACS NOC (611/564-1642) at the agreed upon time per the service order request to coordinate the port.*
- *ACS/CLEC technicians will agree on the first series of lines to be converted. A series in Port Only conversions generally shall be all of the telephone numbers identified on the service order.*
- *ACS will route the identified series of numbers to PODN in their switch.*
- *CLEC shall activate its SV to the NPAC and initiate its tests to validate that dial tone is established for the customer.*
- *Service interruptions for customers shall be consistent with the terms in the relevant interconnection agreement.*
- *CLEC will contact the ACS NOC @ 611/564-1642 when encountering problems on Port Only orders, failed notifications, or failed port.*

EXHIBIT GCI-5(b)

Order Completion

The GCI/ACS Interconnection Agreement Specifically Allows for the Following Services:

- **Field order completions will be accomplished as follows:**
 - ACS will assure that all fieldwork required by ACS to complete a CLEC order will result in appropriately tagged termination information at the NID. NID stickers will be placed, dated and initialed by the ACS technician. If not, CLEC may report issue to ALEC group for review and resolution.
 - ACS Technician will call the designated CLEC can be reached number from the field site, on the newly installed line when possible, at the time of order completion; indicating ACS work complete.
 - Order will be closed to the CLEC within 4 hours after completion.

- **Non-Field Order completions will be accomplished as follows:**
 - **Cut-throughs**
Orders will be completed to GCI within one (1) hour of actual cut-through activity
 - **Conversions-TOD (jumper swing required)**
 - Orders will be completed to GCI within one hour of requested TOD and upon actual jumper swing and switch command
 - **Conversions-Coordinated or Evening**
 - A completion call will be made to GCI within 5 minutes of completion activity (jumper swing and/or switch command)

- **Feature change order completion will be accomplished as follows:**
 - The ACS CSR will advise the CLEC when the order will be completed at the time the service order is placed. Completion will occur within 1 business day.

- **Pic change order completion will be accomplished as follows:**
 - The ACS CSR will advise the CLEC when the order will be completed at the time the service order is placed. Completion will occur within 4 business hours.

EXHIBIT GCI-5(b)

If any service order is not completed pursuant to the terms of the Interconnection Agreement and this document, please e-mail custcare2@acsalaska.com for further investigation.

EXHIBIT GC-6

Common name	ACS wire center CLLI	address	facility type	transport technology	capacity
			(a)	(b)	(c)
North	ANCHRAKXN	1309 E ST	DS1 or DS3	lit fiber	OC12 terminal - ringed w/ADC & East
Central	ANCHRAKXC	3900 DENALI ST	DS1 or DS3	lit fiber	OC48 terminal ringed w/ADC & East OC12 terminal - ring to SADC
South	ANCHRAKXS	1200 E DIAMOND BLVD	DS1 or DS3	lit fiber	OC48 terminal - ringed w/ADC and West OC12 terminal - ringed w/SADC and West
East	ANCHRAKXE	741 DEBARR RD	DS1 or DS3	lit fiber	OC48 terminal - ringed w/ADC & Central OC12 terminal - ringed w/ADC & North
West	ANCHRAKXW	3905 JEWEL LAKE RD	DS1 or DS3	lit fiber	OC48 terminal - ringed w/ADC and South OC12 terminal - ringed w/SADC and South
Rabbit Creek	ANCHRAKXR	4200 E DE ARMOUN RD	DS1 or DS3	lit fiber	Note: fiber terminal not currently installed; terminal would have to be installed when service ordered
O'Malley	ANCHRAKXO	MILE 3 O'MALLEY RD	DS1 or DS3	lit fiber	OC3 integrated w/DLC terminal; very limited DS1 drop capability only
GCI offices	ANCHRAKGC	2550 DENALI	ANCHORAGE, AK 99503		
ADC	ANCHRAKGC	2550 DENALI	ANCHORAGE, AK 99503		
SADC	ANCHRAKXZ	6831 ARCTIC BLVD	ANCHORAGE, AK 99503		
Fairbanks					
Globe	FRBNAKXA	645 5TH AVE	FAIRBANKS, AK 99707	lit fiber	OC48 terminal - ringed w/Van Horn & Greenwood
Greenwood	FRBNAKXC	925 UNIVERSITY AVE	FAIRBANKS, AK 99709	lit fiber	OC48 terminal - ringed w/Van Horn & Globe
GCI offices	FRBNAK07	1300 VAN HORN RD	FAIRBANKS, AK 99701		
Van Horn					
Juneau					
Main	JUNEAIXA	204 MAIN ST	JUNEAU, AK 99801	lit fiber	OC48 terminal - ringed w/Thane Rd & Sterling
Sterling	JUNEAIXS	9229 CESSNA DR	JUNEAU, AK 99811	lit fiber	OC48 terminal - ringed w/Thane Rd & Main
GCI offices					
Thane Rd	JUNEAIXG	1580 THANE ROAD	JUNEAU, AK 99801		
*Note:					
The payload capacity of a ring with multiple nodes must be shared among those nodes.					