

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

In the Matters of	)	
	)	
Petition of Time Warner Cable for Declaratory 55	)	WC Docket No. 06-
Ruling That Competitive Local Exchange	)	
Carriers May Obtain Interconnection Under	)	
Section 251 of the Communications Act of 1934,	)	
as Amended, to Provide Wholesale	)	
Telecommunications Services to VoIP Providers	)	
	)	
Petition of Time Warner Cable for Preemption 54	)	WC Docket No. 06-
Pursuant to Section 253 of the Communications	)	
Act, as Amended	)	

**REPLY COMMENTS OF GENERAL COMMUNICATION, INC.**

General Communication, Inc. (“GCI”) hereby submits its reply comments in support of the above-captioned petitions filed by Time Warner Cable (“TWC”). Given the record provided in the proceeding and the broad support for grant, the Commission should expeditiously grant the requested relief. A clear declaration of interconnection rights and obligations among all providers of voice traffic will help ensure the benefits of competition are not unnecessarily delayed or denied.

GCI is an Alaska-based company providing local and long distance voice, video, and data communications services. It provides competitive telecommunications and cable services to more than 200 communities in

Alaska, and has a long history of investment and innovation, to the benefit of consumers. Interconnection is a necessary component of delivering such benefits to consumers.

GCI introduced long distance competition to Alaska over 20 years ago, brought competition into the market for submarine cable transport between Alaska and the “Lower 48” in 1991 (since then building redundant, ring-protected submarine cable services between Alaska and the lower-48), and in 1996 installed DAMA-capable earth stations in 50 bush communities (*i.e.*, extremely remote, rural communities throughout Alaska), significantly improving service and service capabilities by eliminating the double-hop satellite transmission previously required to complete calls into and out of bush villages. In 1997, GCI entered the local exchange market in Anchorage, followed by Fairbanks and Juneau in 2001 and 2002, respectively, and consumers in these areas have benefited from service and bundling innovations and lower rates. GCI is in the process of deploying cable telephony and converting customers from copper loops to its coax facilities in Anchorage. And just recently, GCI has been certified to provide local service in additional service areas throughout the state, all served by rural carriers, as defined by the Act.

Obtaining direct interconnection from the incumbent local exchange carrier is a necessary predicate for entry. Without it, even fully self-provisioned facilities-based competition is denied, running counter to both cornerstones of the telecommunications Act of 1996--competition and universal service. While it should be without dispute that there is no policy

