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December 21, 2006

REDACTED FOR PUBLIC INSPECTION
VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Ex Parte* Submission of ACS of Anchorage, Inc., *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended, for Forbearance from Section 251(c)(3) and 252(d)(1) in the Anchorage LEC Study Area, WC Docket No. 05-281*

Dear Ms. Dortch:

ACS of Anchorage, Inc. (“ACS”) files this *ex parte* submission in response to a request from the Wireline Competition Bureau staff on December 6, 2006 to provide further information on the competition and facilities in the Elmendorf and Fort Richardson military base areas. As discussed in previous submissions, ACS’s remote facilities in Elmendorf and Fort Richardson are part of the East wire center and are used to provide service to customers located on U.S. government military bases.¹

The residential areas within Elmendorf and Fort Richardson are clustered in densely populated housing developments.² General Communication, Inc. (“GCI”) serves parts of Elmendorf entirely over its own copper facilities.³ Based on data submitted by ACS and GCI as of September 2006, ACS serves approximately [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] lines in Elmendorf and [BEGIN CONFIDENTIAL] [END

¹ *Ex Parte* Submission of ACS of Anchorage, Inc., *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended, for Forbearance from Sections 251(c)(3) and 252(d)(1) of the Communications in the Anchorage LEC Study Area, WC Docket No. 05-281, at 7-8* (filed Nov. 30, 2006) (“ACS Nov. 30 *Ex Parte*”).

² *Id.* at 8.

³ *Id.*

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CONFIDENTIAL] lines in Fort Richardson,⁴ and GCI reports that it serves **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]** lines in Elmendorf and **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]** lines in Fort Richardson.⁵

The limited areas which are served only by ACS and the military do not contain any enterprise customers. **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]**.⁶ As illustrated on the maps attached to ACS's prior *ex parte* submissions,⁷ GCI has facilities adjacent to these areas and can easily serve these customers if it so chooses.

GCI has undeniably made significant inroads in both of these submarkets: GCI serves **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]**. Additionally, GCI serves **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]**.⁸ GCI's competitive presence in Elmendorf and Fort Richardson will rapidly increase, as GCI has **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]**.⁹ Moreover, the Elmendorf and Fort Richardson housing developments are located close to GCI's extensive cable facilities in the North and East wire centers, as well as GCI's copper and fiber facilities.¹⁰ Based on this evidence, forbearance is warranted in Elmendorf and Fort Richardson, as well as in other areas of Anchorage.

Please contact the undersigned if you have any questions regarding this submission.

⁴ Attachment 1 to *Ex Parte* Submission of ACS of Anchorage, Inc., *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended, for Forbearance from Section 251(c)(3) and 252(d)(1) in the Anchorage LEC Study Area*, WC Docket No. 05-281, at 2-3 (filed Nov. 1, 2006) ("ACS Nov. 1 *Ex Parte*").

⁵ *Ex Parte* Submission of General Communication, Inc., *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended, for Forbearance from Sections 251(c)(3) and 252(d)(1) of the Communications in the Anchorage LEC Study Area*, WC Docket No. 05-281, Exhibit V (filed Oct. 24, 2006).

⁶ *Id.* at Exhibit VI; *Ex Parte* Submission of General Communication, Inc., *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended, for Forbearance from Sections 251(c)(3) and 252(d)(1) of the Communications in the Anchorage LEC Study Area*, WC Docket No. 05-281, at 9 n.26 (filed Nov. 14, 2006) ("GCI Nov. 14 *Ex Parte*"); Attachment 1 to ACS Nov. 1 *Ex Parte*.

⁷ Fort Richardson & Elmendorf Maps, attached to ACS Nov. 30 *Ex Parte* as Exhibit C.

⁸ GCI Oct. 24 *Ex Parte* Exhibit V; Attachment 1 to ACS Nov. 1 *Ex Parte*.

⁹ GCI Nov. 14 *Ex Parte* 9 n.26.

¹⁰ DLPS Node and Fiber Maps attached to *Ex Parte* Submission of ACS of Anchorage, Inc., *Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as amended, for Forbearance from Section 251(c)(3) and 252(d)(1) in the Anchorage LEC Study Area*, WC Docket No. 05-281, at 2-3 (filed Sept. 21, 2006).

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Respectfully submitted,

/s/

Karen Brinkmann

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