

LAW OFFICES

BIRCH, HORTON, BITTNER AND CHEROT

A PROFESSIONAL CORPORATION

1155 CONNECTICUT AVENUE, N.W. • SUITE 1200 • WASHINGTON, D.C. 20036 • TELEPHONE (202) 659-5800 • FACSIMILE (202) 659-1027

HAL R. HORTON (1944 - 1998)

RONALD G. BIRCH**
WILLIAM H. BITTNER
KATHRYN A. BLACK
MARK W. BRENNAN∞
SUZANNE CHEROT
JON M. DEVORE**
MARK E. FINEMAN, P.E.
GREGORY S. FISHER

DOUGLAS S. FULLER*
MAX D. GARNER
DAVID KARL GROSS
TINA M. GROVIER
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STEPHEN H. HUTCHINGS
SCOTT M. KENDALL
DANIEL C. KENT

THOMAS F. KLINKNER
STANLEY T. LEWIS
JAMES H. LISTER**†
GREGORY A. MILLER
JENNIFER L. OWENS, Ph.D.
MICHAEL J. PARISE
TIMOTHY J. PETUMENOS
ELISABETH H. ROSS**

OF COUNSEL:
JENNIFER C. ALEXANDER
SHELLEY D. EBENAL
KENNETH E. VASSAR

1127 WEST SEVENTH AVENUE
ANCHORAGE, ALASKA 99501-3
(907) 276-1550
FACSIMILE (907) 276-3660

* D.C. BAR
** D.C. AND ALASKA BAR
∞ FLORIDA BAR
† MARYLAND BAR
‡ NEW YORK BAR
◊ VIRGINIA BAR
ALL OTHERS ALASKA BAR

December 29, 2006

VIA ELECTRONIC FILING

Catherine W. Seidel, Acting Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Dobson Communications Corporation's *Acknowledgement of Confidentiality Pursuant to Protective Order, WT Docket No. 06-114, Applications for the Assignment of Control of Interests in Alaska DigiTel, L.L.C. to General Communication, Inc.*

Dear Ms. Seidel:

On December 27, 2006, Jonathan V. Cohen, counsel for Dobson Communications Corporation ("Dobson") filed an *Acknowledgement of Confidentiality* in the above-captioned proceeding.¹ Mr. Cohen states that he seeks to review the confidential version of the *Memorandum Opinion and Order* issued in this proceeding which contains references to redacted provisions of agreements between Dobson and General Communication, Inc.² ACSW does not object to Mr. Cohen's review of the confidential version of that Order for that purpose.

However, ACSW does object to granting Mr. Cohen blanket access to ACSW disaggregated subscriber information that it included on a confidential basis, pursuant to 47 C.F.R. § 0.459 and the Protective Orders issued in this proceeding, with its Supplemental Comments filed September 6, 2006.³ Possibly, Mr. Cohen could have access to that information by filing the *Acknowledgement of Confidentiality*. First, Mr. Cohen has not stated that he needs to review other confidential information filed in the case that is not contained in the Order. The Commission should not grant Mr. Cohen a right of access to ACSW confidential subscriber data that he has not requested. Mr. Cohen has not demonstrated a need for or interest in this information

Second, under paragraph two of the Protective Orders, "parties" may seek access to confidential documents in the case. Dobson is not a party to this proceeding. It did not file comments or participate in the proceeding.

¹ *Acknowledgement of Confidentiality Pursuant to Protective Order WT Docket No. 06-114, Applications for the Assignment of Control of Interests in Alaska DigiTel, L.L.C. to General Communication, Inc.* (filed December 27, 2006).

² *Applications for the Assignment of Licenses from Denali PCS, L.L.C. to Alaska DigiTel, L.L.C. and the Transfer of Control of Interests in Alaska DigiTel, L.L.C. to General Communication, Inc.*, WT Docket No. 06-114, *Memorandum Opinion and Order*, FCC 06-185 (rel. Dec. 22, 2006) ("MO&O").

³ See *ACS Wireless Inc.'s Request for Confidential Treatment of its Subscriber Data, Applications for the Assignment of Control of Interests in Alaska DigiTel, L.L.C. to General Communication, Inc.*, WT Docket No. 06-114 (filed September 6, 2006).

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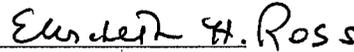
Therefore, by the terms of the Protective Order that includes the Acknowledgement of Confidentiality Mr. Cohen signed, Dobson is not entitled to review confidential documents.

Therefore, ACSW opposes granting blanket access to ACSW disaggregated subscriber information in this case, and requests that Mr. Cohen's access be limited to the confidential version of the MO&O.

ACSW has discussed this issue with Jonathan Cohen. Mr. Cohen has clarified that he filed the Acknowledgement of Confidentiality for the sole purpose of seeking access to the confidential version of the MO&O. He has stated that if he seeks access to other confidential information in the proceeding he will file an additional notification of this request with the Commission and all submitting parties in the case.

A copy of this letter has been served via email on Dobson's Outside Counsel and counsel for the parties in this case.

Sincerely,



Elisabeth H. Ross
Counsel for ACS Wireless, Inc.

cc: Erin McGrath, Wireless Telecommunications Bureau, Federal Communications Commission
Susan Singer, Wireless Telecommunications Bureau, Federal Communications Commission
Jonathan V. Cohen, Counsel for Dobson Communications Corporation
Stefan M. Lopatkiewicz, Counsel for MTA Communications, Inc., d/b/a MTA Wireless
Thomas Gutierrez, Counsel for Denali PCS, L.L.C. and Alaska DigiTel, L.L.C.
Carl W. Northrop, Counsel for General Communication, Inc.