

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  
SUZANNE CHEROT  
ADAM W. COOK  
JON M. DEVORE\*\*  
MARK E. FINEMAN, P.E.  
GREGORY S. FISHER  
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MAX D. GARNER  
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DAVID E. LAMPP\*  
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 99501-3399  
(907) 276-1550  
FACSIMILE (907) 276-3680

\* D.C. BAR  
\*\* D.C. AND ALASKA BAR  
† MARYLAND BAR  
◇ VIRGINIA BAR  
ALL OTHERS ALASKA BAR

December 12, 2007

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

*RE: Federal-State Joint Board on Universal Service, High Cost Universal Service Support, WC Docket No. 05-337; Federal-State Joint Board on Universal Service, CC Docket No. 96-45*

Dear Ms. Dortch:

On December 11, 2007, Leonard Steinberg, General Counsel and Corporate Secretary of Alaska Communications Systems, accompanied by Karen Brinkmann and Liz Park, of Latham and Watkins, met with Ian Dillner, Legal Advisor for Wireline Issues to Chairman Kevin Martin; Chris Moore, Legal Advisor to Commissioner Deborah Taylor Tate; and Scott Bergman, Legal Advisor for Wireline Issues to Commissioner Jonathan Adelstein. On December 12, 2007, the parties met with John Hunter, Chief of Staff and Senior Legal Advisor, Wireline Issues to Commissioner Robert McDowell.

During these meetings, Mr. Steinberg discussed a letter<sup>1</sup> filed by ACS Wireless, Inc. in these dockets that addressed GCI's proposal to exclude certain service provided on tribal lands and Alaska Native Regions from the proposed competitive eligible telecommunications carrier Universal Service Fund cap. Mr. Steinberg reiterated ACSW's rural Alaska broadband deployment proposal that would meet the special needs of Alaska, but in a manner that would allow multiple providers into the process and bring the additional benefits of competition into the mix. Mr. Steinberg distinguished ACSW's proposal from GCI's proposal, which he noted was designed to meet the public need in a way that differentially benefits that particular company.

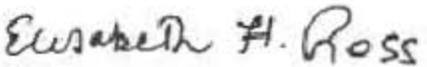
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<sup>1</sup> Letter from Leonard Steinberg, General Counsel and Corporate Secretary, ACS Communications Systems, Inc. and Elisabeth Ross, Birch, Horton, Bittner and Cherot, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 05-337, CC Docket No. 96-45 (filed November 14, 2007).

Ms. Marlene Dortch  
December 12, 2007  
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Pursuant to Section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed. Please let me know if you have any questions regarding this submission.

Sincerely,

A handwritten signature in black ink that reads "Elisabeth H. Ross". The signature is written in a cursive style with a large initial 'E'.

Elisabeth H. Ross  
Counsel for ACS Wireless, Inc.

cc: Ian Dillner  
Chris Moore  
John Hunter  
Scott Bergman