



Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

April 16, 2008

Via First Class Mail and Facsimile

Mr. Thomas Gutierrez
Lukas, Nace, Gutierrez & Sachs
1650 Tysons Boulevard, Suite 1500
McLean, VA 22102

Mr. Carl W. Northrop
Paul Hastings Janofsky & Walker, LLP
875 15th Street, NW, 12th Floor
Washington, DC 20005

Re: Application for the Transfer of Control of Alaska DigiTel, LLC from AKD Holdings, LLC to GCI, Inc.; File No. 0003258714 (WT Docket No. 08-10)

Dear Messrs. Gutierrez and Northrop:

On December 21, 2007, the Commission received applications seeking consent for the transfer of control of various Commission licenses and authorizations held by Alaska DigiTel, LLC ("Alaska DigiTel") from AKD Holdings, LLC ("AKD") to GCI, Inc. ("GCI"), a wholly-owned subsidiary of General Communication, Inc. ("General").¹ In order for the Commission to complete its review of the application and make the necessary public interest findings under section 310(d) of the Communications Act,² we require additional information and clarification of certain matters discussed in the applications. If necessary, we will follow up with additional requests for information.

Accordingly, pursuant to section 308(b) of the Act,³ we request that you provide written responses and supporting documentation for each request set forth in the attachment and, where appropriate, amend the lead application to reflect such responses. Each response or document should clearly indicate the specific question or request to which it responds. We would appreciate receiving your response to each inquiry no later than April 28, 2008.

Your responses should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, under docket number WT Docket No. 08-10. In addition, the Public Notice and the Protective Order require the submission of multiple copies of all *ex parte* and other filings submitted in

¹ Application for the Transfer of Control of Alaska DigiTel, LLC from AKD Holdings, LLC to GCI, Inc., File No. 0003258714 (filed Dec. 21, 2007; amended Jan. 8, 2008). The applications were placed on public notice on January 22, 2008. Alaska DigiTel, LLC, AKD Holdings, LLC, and GCI, Inc. Seek FCC Consent To Transfer Control of Licenses, WT Dkt. No. 08-10, *Public Notice*, DA 08-142 (rel. Jan. 22, 2008). A protective order was released on January 23, 2008. Applications of AKD Holdings, LLC, Alaska DigiTel, LLC, and GCI, Inc. for Approval To Transfer Control, WT Dkt. No. 08-10, *Protective Order*, DA 08-141 (rel. Jan. 23, 2008).

² 47 U.S.C. § 310(d).

³ *Id.* § 308(b).

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this proceeding.⁴ The Wireless Telecommunications Bureau should receive, at a minimum, two copies of all paper filings. If you submit information pursuant to the Protective Order issued in this proceeding, you should deliver to Erin McGrath or Susan Singer of the Wireless Telecommunications Bureau two copies of the unredacted documents marked "Confidential Information – Subject to Protective Order in WT Docket No. 08-10 before the Federal Communications Commission" and two copies of the redacted documents marked "Redacted – For Public Inspection."⁵ For any electronic filings made using the Commission's Electronic Comment Filing System ("ECFS"), parties also should serve the documents via e-mail to Erin McGrath, erin.mcgrath@fcc.gov, and to Susan Singer, susan.singer@fcc.gov.

If you have any questions regarding this matter, please contact Erin McGrath or Susan Singer, Wireless Telecommunications Bureau, at (202) 418-2042 or (202) 418-1340, respectively.

Sincerely,



Fred B. Campbell, Jr.
Chief, Wireless Telecommunications Bureau

Attachment

cc: Jonathan D. Foxman, Chinook Wireless
Julia K. Tanner, Chinook Wireless

⁴ Applications for the Assignment of Licenses and Authorizations 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, *Protective Order*, DA 06-1246 (rel. June 9, 2006).

⁵ *See id.*

General Information Request
April 16, 2008

I. DEFINITIONS

1. The term "GCI" means GCI, Inc.
2. The term "General" means General Communication, Inc.
3. The term "Alaska DigiTel" means Alaska DigiTel LLC.
4. The term "AKD" means AKD Holdings, LLC.
5. The term "Dobson" means Dobson Communications Corporation.
6. The term "AT&T" means AT&T, Inc.
7. The term "Sprint" means SprintCom, Inc.
8. The term "NRUF" means Numbering Resource Utilization and Forecast.

II. DOCUMENT AND DATA REQUEST REGARDING MATERIAL CONTAINED IN THE APPLICATION

1. Provide any resale/wholesale/MVNO-type agreement(s) between GCI/General and Dobson/AT&T.
2. Provide the spectrum leasing agreement and any additional agreements between Alaska DigiTel and Sprint.
3. Explain why the MVNO-type arrangement between GCI/General and Dobson/AT&T renders moot any and all of the conditions imposed by the Commission in Applications for the Assignment of License 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 Communications, Inc., WT Docket No. 06-114, *Memorandum Opinion and Order*, FCC 06-185 (rel. Dec. 22, 2006).
4. Explain the steps and timeline for the transition from the Dobson/GCI resale agreement to the new AT&T/GCI MVNO-type resale agreement.
5. Explain GCI/General's plan for transitioning customers from service provided on the underlying Dobson/AT&T systems to service on the Alaska DigiTel system(s).
6. Explain whether GCI/General intends to continue to build out the Alaska DigiTel systems with CDMA technology or convert the systems to GSM technology.
7. Provide subscriber numbers for GCI/General and Alaska DigiTel by borough (county).