



Tina M. Pidgeon
(202) 457-8812
tpidgeon@gci.com

March 18, 2009

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20556

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

Dear Ms. Dortch:

GCI Communication Corp. (“GCI”) and Alaska DigiTel hereby elect application of the tribal lands exemption as outlined in the *Interim Cap Order*¹ and the *Tribal Lands Waiver Order*² to all eligible study areas as of the August 1, 2008 effective date. The uncertainty resolved by the *Tribal Lands Waiver Order* precluded election until after that Order was granted.

GCI is an eligible telecommunications carrier (“ETC”) in the following study areas: ACS of Anchorage (613000), ACS-Fairbanks, Inc. (613008), ACS-N Glacier State (613010), ACS-AK Juneau (613012), ACS-AK Greatland (613022), Matanuska Telephone Association (613015), Ketchikan Public Utility (613013), Mukluk Tel Co Inc (613016), and Adak Tel Utility (610989).

Alaska DigiTel is an ETC in the following study areas: ACS of Anchorage (613000), ACS-Fairbanks, Inc. (613008), ACS-N Glacier State (613010), ACS-AK Juneau (613012), Matanuska Telephone Association (613015), and ACS-AK Greatland (613022).

The undersigned hereby attests that the entirety of each identified study area is a Covered Location, as that term is defined in the *Interim Cap Order*.³

¹ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, Order, WC Docket No. 05-337 and CC Docket No. 96-45, 23 FCC Rcd 8834 (2008) (“*Interim Cap Order*”).

² *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, Order, WC Docket No. 05-337 and CC Docket No. 96-45 (rel. Mar. 5, 2009) (“*Tribal Lands Waiver Order*”).

³ *Interim Cap Order* at ¶ 32 & n.95.

Ms. Marlene Dortch

March 18, 2009

Page 2 of 2

Should you have any questions, please do not hesitate to contact our counsel John Nakahata by telephone at (202) 730-1320 or by email at jnakahata@harriswiltshire.com.

Sincerely,

/s/

Tina Pidgeon

Vice President, Federal Regulatory Affairs

cc (via electronic mail):

Jennifer McKee, FCC

Karen Majcher, USAC