

ATTACHMENT A

DECLARATION OF MATTHEW PETERSON

I, Matt Peterson, hereby make the following declarations, under penalty of perjury, in support of the foregoing Reply Comments of Alaska Communications Systems Group, Inc. ("Reply Comments"):

1. I am Vice President, Engineering and Network Development, for Alaska Communications Systems Group, Inc. ("ACS"), and I am familiar with ACS's network facilities, network technologies, and network interconnections for providing wireline and wireless telecommunications, information, broadband, and other network services by the ACS companies.

2. ACS believes that embedded technology ultimately will be available to enable efficient and accurate speed testing from the subscriber handset or customer premises equipment to the primary Internet peering locations, initiated by either the carrier or the customer, but necessary equipment is not yet available to enable carriers to test and deploy these functionalities throughout their subscriber base.

3. Today, ACS does not have the ability to test end-to-end speeds at each user device.

4. Third-party systems are available for monitoring speed on a per-user basis, through external probes, but ACS has not yet deployed such a system for wireless or wireline broadband subscribers.

5. Current network performance testing often is unreliable due to a number of obstacles, including interference from other users, inside wiring issues, failure of subscriber equipment, and even the time of day when testing is performed.

The foregoing is true and complete to the best of my information, knowledge, and belief, as of the date of this declaration.


Matthew Peterson

Executed: February 17, 2012