

February 29, 2012

**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND
PROTECTIVE ORDER IN WC DOCKET NOS. 10-90 AND 05-337 BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

REDACTED FOR PUBLIC INSPECTION

BY HAND DELIVERY & ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

FILED/ACCEPTED
FEB 29 2012
Federal Communications Commission
Office of the Secretary

Re: *Wireline Competition Bureau Seeks Comment on Potential Data for Connect America Fund Phase One Incremental Support*, FCC Public Notice in WC Dockets 10-90 and 05-337, DA 12-137 (Wireline Competition Bur., rel. Feb. 6, 2011) (“*CAF I Wire Center Public Notice*”); *Second Protective Order* in WC Docket Nos. 10-90 and 05-337, DA 12-192 (Wireline Competition Bur., rel. Feb. 10, 2012)

Dear Ms. Dortch:

Pursuant to the *CAF I Wire Center Public Notice* and *Second Protective Order* cited above, Alaska Communications Systems Group, Inc., on behalf of its four incumbent local exchange carrier subsidiaries (“ACS”), hereby files data for the calculation of the incremental support amounts that will be made available under the Connect America Fund (“CAF”) Phase I mechanism. In this filing, ACS provides wire center data specific to ACS, which ACS believes will be useful to the Bureau in determining which wire centers are eligible for CAF Phase I incremental support, and in calculating the distribution of support among price cap carriers under the Commission’s high-cost proxy model. Two categories of information are provided with this filing:

- First, in paragraph 4 of the *CAF I Wire Center Public Notice*, parties are invited to submit data on a wire center basis for each of the input variables used in the high-cost model; ACS provides herewith the data that is responsive to several of those variables for each ACS wire center. ACS intends to file data that is responsive

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List ABCDE

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to the remaining variables in a subsequent filing.¹

- Second, ACS reviewed the list of wire centers for price cap carriers published by the Commission as set forth in paragraph 5 of the *CAF I Wire Center Public Notice*; on an attachment hereto, ACS identifies five ACS wire centers that are missing from that list, as well as one wire center that appears erroneously on the list.

Certain of the information filed herewith is proprietary and highly confidential to ACS. If released to competitors or others with whom ACS does business, it could allow those persons to gain a significant advantage in the marketplace or in negotiations. It meets the definition of Highly Confidential Information set forth in the Second Protective Order cited above. Therefore, ACS has marked each page of its Stamped Highly Confidential Documents with the legend required in paragraph 5 of the Second Protective Order, indicating it is Highly Confidential Information, and has indicated that the documents contain such sensitive information that the copying of the Stamped Highly Confidential Documents is restricted, as provided for in paragraph 6 of the Second Protective Order.

ACS is filing herewith one copy of ACS's Stamped Highly Confidential Documents as defined in the Second Protective Order, and two redacted copies. ACS also provides two copies of each Stamped Highly Confidential Document for Katie King. Please direct any questions regarding this matter to me.

Very truly yours,



Karen Brinkmann
Counsel for Alaska Communications Systems Group, Inc.

cc: Steven Rosenberg, Wireline Competition Bureau
Katie King, Special Counsel, Telecommunications Access Policy Division ("TAPD"), Wireline Competition Bureau
Joseph Cavender, TAPD, Wireline Competition Bureau
Charles Tyler, TAPD, Wireline Competition Bureau

¹ Comments are due by March 19, 2012. See 77 Fed. Reg. 9653 (Feb. 17, 2012). ACS files the attached data at this time to assist the Bureau in meeting its March 31 deadline for announcement of CAF Phase I incremental support amounts for each price cap carrier.

Alaska Communications Location Factors
 February 28, 2012

ACS Wire Center	Census Bureau HU100	Business Factor	Total Customer Locations	Business Locations
ANCHORAGE C	12945			
ANCHORAGE E	23217			
ANCHORAGE N	21912			
ANCHORAGE/O'MALLEY	2607			
ANCHORAGE R	9452			
ANCHORAGE S	21369			
ANCHORAGE W	15803			
ANCHORAGE/ELMENDORF	2002			
ANCHORAGE/FTRICH	2049			
ANCHORAGE/GIRDWD	1542			
ANCHORAGE/INDN	134			
Akhiok	27			
Akutan	44			
Atka	43			
Chignik Lagoon	66			
Chignik	105			
Chignik Lake	50			
Egegik	256			
Nanwalek	73			
False Pass	40			
Halibut Cove	161			
Ivanof Bay	12			
Kaltag	87			
Karluk	21			
KOKHONAK	65			
Koyukuk	54			
Larsen Bay	70			
Port Heiden	56			
Nikolski	23			
Nondalton	94			
Nulato	134			
Pedro Bay	33			
Perryville	50			
Pilot Point	65			
Port Graham	108			
Port Alsworth	74			
Saint George	61			
Saint Paul	190			
Yakutat	383			
HOPE	197			
HOMER	2692			
KENAI	3166			
Nelson Lagoon	32			
NINILCHIK	967			
NORTH KENAI				
SELDOVIA	218			
SOLDOTNA	1968			
Border City	23			

**Alaska Communications Location Factors
 February 28, 2012**

ACS Wire Center	Census Bureau HU100	Business Factor	Total Customer Locations	Business Locations
Hughes	40			
Huslia	105			
Northway	38			
DELTA JUNCTION	517			
EIELSON AFB	848			
FAIRBANKS	40503			
FORT GREELY	364			
FORT WAINWRIGHT	179			
NENANA	215			
NORTH POLE	916			
Angoon	256			
Coffman Cove	168			
Elfin Cove	28			
Gustavus	488			
Hoonah	399			
Kake	290			
Kasaan	44			
Klawock	363			
Point Baker	18			
Port Alexander	64			
Port Protection	43			
Thorne Bay	354			
Tenakee Springs	180			
DOUGLAS	2271			
JUNEAU	2523			
LEMON CREEK	1497			
STERLING	6764			
PELICAN	77			
SITKA	4102			
Old Harbor	105			
Ouzinkie	88			
KODIAK	2178			
KODIAK (COAST GUARD)	355			
	<hr/> 191120			

**Weighted Avg using ABC Model of Total Subscribers to allocate Census Bureau's total Household Units for Anch

ACS WIRE CENTER DATA

Missing

Wire Center	CLLI	Count	CLLI (NECA Tariff 4)
Ivanof Bay	IVBAAKXA	1	IVBAAKXADS1
Anchorage	ANCRAKXC	1	ANCRAKXCDS1
Anchorage	ANCRAKXN	1	ANCRAKXNDS1
Sterling	JUNEAKXS	1	JUNEAKXSRS1
Kenai	KENAAKXA	1	KENAAKXADS1

Not in the NECA 4 Tariff. Unknown Wire Center

613010	3030 AK	FTGRAKXG
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ACS WIRE CENTER DATA

WIRE CENTERS

Holding Company / Common Control SAC OCN ST	SAC	OCN	ST	WC	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	AKHKAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	AKTNAKXA	
Alaska Communications Systems Holdings, Inc.	613000		3000 AK	ANCRAXXE	
Alaska Communications Systems Holdings, Inc.	613000		3000 AK	ANCRAXXO	
Alaska Communications Systems Holdings, Inc.	613000		3000 AK	ANCRAXXR	
Alaska Communications Systems Holdings, Inc.	613000		3000 AK	ANCRAXXS	
Alaska Communications Systems Holdings, Inc.	613000		3000 AK	ANCRAXXW	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	ANGNAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	ATKAAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	BRCYAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	CFCVAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	CGLGAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	CGLKAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	CGNKAKXA	
Alaska Communications Systems Holdings, Inc.	613012		3022 AK	DGLSAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	DLJTAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	EFCVAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	EGEKAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	EHBAKXA	
Alaska Communications Systems Holdings, Inc.	613000		3000 AK	ELMNAKXA	
Alaska Communications Systems Holdings, Inc.	613012		3022 AK	ELSNKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	FLPSAKXA	
Alaska Communications Systems Holdings, Inc.	613008		3008 AK	FRBNKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	FTGRAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	FTGRAKXG	Not in NECA Tariff 4
Alaska Communications Systems Holdings, Inc.	613000		3000 AK	FTRCAKXA	
Alaska Communications Systems Holdings, Inc.	613012		3022 AK	FTWRAKXA	
Alaska Communications Systems Holdings, Inc.	613000		3000 AK	GRWDAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	GSTVAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	HGHSKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	HOMRAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	HONHAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	HTCVAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	HUSLAKXA	
Alaska Communications Systems Holdings, Inc.	613000		3000 AK	INDNAKXA	
Alaska Communications Systems Holdings, Inc.	613012		3022 AK	JUNEAKXA	
Alaska Communications Systems Holdings, Inc.	613012		3022 AK	JUNEAKXB	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	KAKEAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	KASNAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	KHNKAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	KLTGAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	KLWKAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	KODKAKAG	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	KODKAKXC	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	KRLKAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	KYKAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	LRBAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	MSHKAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	NCHKAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	NDLTAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	NENAAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	NKENAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	NKLIKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	NLLGAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	NRPLAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	NRWYAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	NULTAKXA	
Alaska Communications Systems Holdings, Inc.	613010		3030 AK	OLHBKXA	

ACS WIRE CENTER DATA

Alaska Communications Systems Holdings, Inc.	613010	3030 AK	OUZNAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	PDBAAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	PLCNAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	PLPTAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	PNBKAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	PTAHAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	PTALAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	PTGMAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	PTPRAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	PYVLAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	SITKAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	SLDTAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	SLDVAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	STGRAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	STPLAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	THBYAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	TKSPAKXA
Alaska Communications Systems Holdings, Inc.	613010	3030 AK	YKUTAKXA