



**PUBLIC VERSION**

July 10, 2012

FILED/ACCEPTED

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

JUL 10 2012

Federal Communications Commission  
Office of the Secretary

Re: REQUEST FOR CONFIDENTIAL TREATMENT  
ACS Wireless Inc. – 2012 Eligible Telecommunications Carrier  
Certification Pursuant to 47 C.F.R. § 54.313(a)  
WC Docket No. 10-90

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Dear Ms. Dortch:

Together with this Request for Confidential Treatment, and pursuant to the requirements of Section 54.313(a) of the Commission’s rules, 47 C.F.R. § 54.313(a), ACS Wireless, Inc. (“ACS Wireless”) is submitting a copy of its annual Eligible Telecommunications Carrier (“ETC”) Report previously filed with the Regulatory Commission of Alaska (“RCA”) on April 24, 2012 (the “RCA Report”). Pursuant to Section 0.459(b) of the Commission’s rules, ACS Wireless requests confidential treatment of certain confidential portions of Exhibit B to the RCA Report. In support of this request, ACS Wireless hereby states as follows:

- (1) **Identification of the specific information for which confidential treatment is sought.** ACS Wireless seeks confidential treatment of certain portions of Attachment B to the RCA Report, specifically Table 1 (rows 3 - 12), and Table 2 (column 3), which show competitively sensitive details of ACS Wireless’s network improvements using federal universal service support funds.
- (2) **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.** Attachment B is part of the RCA Report, which ACS Wireless is required to submit in fulfillment of its obligation, pursuant to Section 54.313(a)(2-6) of the Commission’s rules, 47 C.F.R. § 54.313(a)(2-6), adopted as part of the *USF/ICC Transformation Order* and the Commission’s implementing Public Notice and *Third Order on Reconsideration*.<sup>1</sup> As

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<sup>1</sup> *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17663 (2011) (“*USF/ICC*”

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Request for Confidential Treatment  
ACS Wireless, Inc. 2012 Eligible Telecommunications Carrier  
Certification Pursuant to 47 C.F.R. § 54.313(a)  
July 10, 2012  
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indicated in the *Third Order on Reconsideration*, at ¶ 6, the Commission does “not expect state-designated ETCs to report to the Commission information in their 2012 filing that they were not previously required to collect . . . . But if a state-designated ETC is subject to a state requirement to report some or all of this information annually to the state, then the ETC should file a copy of any relevant information with the Commission in 2012.”

- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.** The portions of Exhibit B to the RCA Report for which confidential treatment is sought contain highly sensitive data regarding ACS Wireless’s operations and business plans, particularly relating to its business judgments regarding its network coverage and capacity, as well as the areas where investment is most needed. Exhibit B contains confidential and proprietary information regarding capital expenditures and operating expenses, including disaggregated capital and expense information for each study area that is more detailed than any that ACS Wireless is required to disclose publicly in any other forum. The RCA has granted confidential treatment of this information. A competitor could use this proprietary and competitively sensitive information for marketing purposes or in developing its own deployment strategies in these areas, which would put ACS-W at a competitive disadvantage.
- (4) Explanation of the degree to which the information concerns a service that is subject to competition.** ACS Wireless operates in some of the most competitive telecommunications markets in the country, facing substantial competition from wireline incumbents, competitive providers, and wireless ETCs virtually throughout its service areas. The presence of such competition and the likelihood of competitive injury threatened by release of the information provided to the Commission by AT&T should compel the Commission to withhold the information from public disclosure. *CNA Financial Corp. v. Donovan*, 830 F.2d 1132, 1152 (D.C. Cir. 1987); *Frazer v. U.S. Forest Service*, 97 F.3d 367, 371 (9th Cir. 1996); *Gulf & Western Indus. v. U.S.*, 615 F.2d 527, 530 (D.C. Cir. 1979).

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*Transformation Order*”) (subsequent history omitted); *see also Connect America Fund*, WC Docket No. 10-90, Third Order on Reconsideration, FCC 12-52, 27 FCC Rcd 5622 (2012) (“*Third Order on Reconsideration*”); *Wireline Competition Bureau Announces Filing Deadline of July 2, 2012, for Eligible Telecommunications Carriers to File Reports Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Commission’s Rules*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51, CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208, Public Notice, DA 12-729 (rel. May 8, 2012).

- (5) **Explanation of how disclosure of the information could result in substantial competitive harm.** A number of wireless and wireline service providers compete, or could potentially compete, with ACS Wireless within its service areas. If the confidential portions of Attachment B to the RCA Report were disclosed, these service providers would gain access highly sensitive and confidential information regarding ACS Wireless's operations and business plans. Disclosure of this information would give ACS Wireless's competitors an unfair and unwarranted competitive advantage in the market. Illustrating this point, in making these filings before the RCA, ACS Wireless's competitors requested and were granted confidential treatment for the same type of capital and operating expense data filed pursuant to the RCA's ETC annual reporting requirements.
- (6) **Identification of any measures taken by the submitting party to prevent unauthorized disclosure.** The information for which confidential treatment is sought is not normally distributed, circulated, or provided to any party outside of ACS Wireless and its affiliates. ACS Wireless treats this information as sensitive information; thus only specialized personnel within the company have access to it.
- (7) **Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.** The information in the confidential portions of Attachment B to the RCA Report is not available to the public, and has not previously been disclosed to third parties. As indicated, the RCA has granted confidential treatment of this information.
- (8) **Justification of the period during which the submitting party asserts that material should not be available for public disclosure.** ACS Wireless maintains that the information in the confidential portions of Attachment B to the RCA Report should remain subject to confidential treatment indefinitely. Even historical data can be used to track trends or business decisions, so disclosure of this information could offer a competitive advantage to ACS Wireless's competitors, even in the future.
- (9) **Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.** The information in the confidential portions of Attachment B to the RCA Report falls under Exemption 4 of the Freedom of Information Act (FOIA), insofar as this information is (i) commercial or financial in nature; (ii) obtained by a person outside government; and (iii) privileged and confidential. *See, e.g., Washington Post Co. v. U.S. Department of Health and Human Services*, 690 F.2d 525 (D.C. Cir. 1982).

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For the foregoing reasons, and pursuant to section 0.459 of the Commission's rules, 47 C.F.R. § 0.459, ACS Wireless requests that the Commission withhold from public disclosure the information contained in the confidential portions of Attachment B to the RCA Report. If the Commission is unable for any reason to keep this information confidential, ACS Wireless respectfully requests that the Commission return the information pursuant to section 0.459(e) of the Commission's rules, 47 C.F.R. § 0.459(e).

As required by Section 1.419 of the Commission's rules, 47 C.F.R. § 1.419, enclosed are the original and one copy of this filing. Please date-stamp and return to me the additional copy provided for that purpose. Should you have any questions, please contact the undersigned at (202) 230-4962 or Richard.Cameron@acsalaska.com.

Very truly yours,



Richard R. Cameron  
Assistant Vice President and Senior Counsel

cc: T.W. Patch, Chairman  
Regulatory Commission of Alaska  
(with attachments)

Karen Majcher  
Vice President, High Cost and Low Income  
Universal Service Administrative Company  
(with attachments)



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July 10, 2012

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

Re: ACS Wireless Inc. – 2012 Eligible Telecommunications Carrier  
Certification Pursuant to 47 C.F.R. § 54.313(a)  
WC Docket No. 10-90

---

Dear Ms. Dortch:

Pursuant to the requirements of Section 54.313(a) of the Commission's rules, 47 C.F.R. § 54.313(a), ACS Wireless, Inc. ("ACS Wireless") is submitting a copy of its annual Eligible Telecommunications Carrier ("ETC") Report previously filed with the Regulatory Commission of Alaska ("RCA") on April 24, 2012 (the "RCA Report"). In connection with this filing, ACS Wireless is also submitting a request for confidential treatment of certain portions of Exhibit B to the RCA Report attached hereto.

ACS Wireless is submitting the RCA Report in fulfillment of its obligations to report certain information related to its operations and use of federal universal service support funds pursuant to Section 54.313(a)(2-6) of the Commission's rules, 47 C.F.R. § 54.313(a)(2-6), which was adopted as part of the *USF/ICC Transformation Order*.<sup>1</sup> Implementing this rule, the Commission has clarified that it does "not expect state-designated ETCs to report to the Commission information in their 2012 filing that they were not previously required to collect . . . . But if a state-designated ETC is subject to a state requirement to report some or all of this information annually to the state, then the ETC should file a copy of any relevant information with the Commission in 2012." *Third Order on Reconsideration*, at ¶ 6.

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<sup>1</sup> *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17663 (2011) ("*USF/ICC Transformation Order*") (subsequent history omitted); *see also Connect America Fund*, WC Docket No. 10-90, Third Order on Reconsideration, FCC 12-52, 27 FCC Rcd 5622 (2012) ("*Third Order on Reconsideration*"); *Wireline Competition Bureau Announces Filing Deadline of July 2, 2012, for Eligible Telecommunications Carriers to File Reports Pursuant to Section 54.313(a)(2) through (a)(6) and (h) of the Commission's Rules*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51, CC Docket Nos. 01-92, 96-45; WT Docket No. 10-208, Public Notice, DA 12-729 (rel. May 8, 2012).

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Federal Communications Commission  
ACS Wireless, Inc. 2012 Eligible Telecommunications Carrier  
Certification Pursuant to 47 C.F.R. § 54.313(a)  
July 10, 2012  
Page 2

ACS submits the attached RCA Report in fulfillment of this Commission directive for 2012 to provide a copy of the annual report it is required to file with the RCA. To the extent that this RCA Report does not address any requirement of Section 54.313(a) (2-6), the RCA does not require ACS Wireless to collect or provide such information. Accordingly, as indicated in the *Third Order on Reconsideration*, ACS Wireless is not required to provide such information to the Commission this year.

ACS Wireless acknowledges that Section 54.313(j) of the Commission's rules, 47 C.F.R. § 54.313(j), required ACS Wireless to submit this information by July 2, 2012. ACS Wireless regrets that this filing therefore appears to be late by five business days. In the coming days, ACS Wireless intends to submit a Request for Waiver detailing the surrounding facts and circumstances, and requesting that the Commission give this filing effect as if made on a timely basis on July 2, 2012. In the meantime, ACS Wireless has taken this step to provide the filing as quickly as possible.

As required by Section 1.419 of the Commission's rules, 47 C.F.R. § 1.419, enclosed are the original and one copy of this filing. Please date-stamp and return to me the additional copy provided for that purpose. Should you have any questions, please contact the undersigned at (202) 230-4962 or [Richard.Cameron@acsalaska.com](mailto:Richard.Cameron@acsalaska.com).

Very truly yours,



Richard R. Cameron  
Assistant Vice President and Senior Counsel



April 24, 2012

Regulatory Commission of Alaska  
701 West Eighth Avenue, Suite 300  
Anchorage, Alaska 99501

RE: Annual ETC Report in Compliance with 3 AAC 53.460

Dear Commissioners:

On April 14, 2012, ACS Wireless, Inc. filed a request for an extension of time to file its annual ETC Report. In the filing ACS Wireless, Inc. stated it would file the Annual ETC Report by April 23, 2012. ACS Wireless, Inc. respectfully requests that the Commission accept its late filing and hereby transmits its Annual ETC Report in compliance with 3 AAC 53.460.

If you have any questions, please contact Robert Foote-Jones, Associate Regulatory Compliance Analyst, at 564-3230 or myself at 297-3130.

Sincerely,

ACS of the NORTHLAND, INC.

A handwritten signature in black ink, appearing to read 'Lisa Phillips', written in a cursive style.

Lisa Phillips  
Manager, Regulatory Affairs

Attachments

**Annual ETC Reporting Requirements  
3 AAC 53.460**

**ACS Wireless, Inc. (ACS-W)**

**3 AAC 53.460(a)(1):** An update of the common carrier’s network deployment plan that details services provided within the eligible telecommunications carrier service area and includes:

(A): Maps detailing progress towards meeting network deployment targets.

Please see Exhibit A.

(B): The amount of Universal Service Support received:

<u>Study Area Name</u>	<u>HCLS</u>	<u>ICLS</u>	<u>LS</u>	<u>SNA</u>	<u>TOTAL</u>	<u>Lifeline &amp; LinkUp</u>	<u>State Support</u>
ACS- Anchorage		\$3,118,079			\$3,118,079	\$2,238,384	\$215,114
ACS-AK- Juneau		\$274,099	\$261,728		\$535,827	\$129,567	\$12,452
ACS-AK- Greatland		\$25,075	\$53,810		\$78,885	\$6,469	\$622
ACS- Fairbanks		\$1,337,759	\$457,822		\$1,795,581	\$586,103	\$56,326
ACS-N- Glacier State	\$3,189,846	\$3,690,925	\$464,538		\$7,345,309	\$1,126,337	\$108,244
APT	\$171,121	\$345,267	\$196,352	\$17,604,	\$730,344	\$6,615	\$636
Copper Valley	\$888,915	\$409,516	\$100,705	\$18,390	\$1,417,526	\$38,230	\$3,674
Ketchikan	\$642,048	\$609,623	\$70,901	\$72,607	\$1,395,179	\$71,198	\$6,842
MTA	\$3,334,572	\$3,815,135	\$282,507		\$7,432,214	\$642,462	\$61,742
<b>2011 Total</b>	<b>\$8,226,502</b>	<b>\$13,625,478</b>	<b>\$1,888,363</b>	<b>\$108,601</b>	<b>\$23,848,944</b>	<b>\$4,845,366</b>	<b>\$465,652</b>

(C): An explanation of how Universal Service Support was used in the previous year to improve service quality, coverage, or capacity.

**ACS-W employs Universal Service Support funds received to provision, maintain, and upgrade its facilities and services for which the support was intended, pursuant to 47 U.S.C. 254(e). See Exhibit B.**

- a) **Anchorage Study Area.** ACS-W has completed its planned build out in this study area. ACS-W has used its 2011 USF support to significantly upgrade and operate its CDMA facilities, including building three new sites, upgraded two sites and adding Rev-A and EVDO capabilities for numerous sites.
- b) **Fairbanks Study Area.** ACS-W has completed its planned build-out in this study area. ACS-W has used its 2011 USF support to significantly upgrade and operate its CDMA facilities, sectorization of three sites as well as adding Rev-A and EVDO capabilities. Battery upgrades were completed in the Fairbanks study area.
- c) **Juneau-Greatland Study Area.** ACS-W has completed its planned build out in this study area. ACS-W has used its 2011 USF support to upgrade and operate its CDMA facilities to improve wireless coverage as well as upgrade its batteries.
- d) **Glacier State Study Area.** ACS-W has completed its planned build-out in this study area. ACS-W has used its 2011 USF support to significantly upgrade its CDMA facilities, adding sectorization to improve coverage, and adding Rev-A and EVDO capabilities to sites at Nikiski, Cooper Landing, Clam Gulch, Ninilchik, Seldovia and Kodiak.
- e) **MTA Study Area.** ACS-W has used its 2011 USF support to significantly upgrade its CDMA facilities, enable new Rev A EVDO including building two new sites, adding increased sectorization and capacity to sites to improve wireless coverage, and upgraded batteries at numerous sites.
- f) **Ketchikan Study Area.** ACS-W has completed its planned build-out in this study area. ACS-W has used its 2011 USF support to upgrade and operate its CDMA facilities, including battery upgrades at the remote sites of Gravina and Ratz Mountain.
- g) **Copper Valley Study Area.** Through a combination of ACS-W's fourteen Copper Valley cell sites, ACS-W owned and leased backhaul facilities, and a roaming agreement with Cover Valley Wireless, ACS-W is providing ubiquitous wireless service within its study area. Prior to the economic downturn, ACS-W had completed a majority of its build-out in CVTC. Subsequently, due to resource constraints, the deployment of additional sites in Mentasta, Tatitlek, McCarthy and Chitna exchanges has been delayed. ACS W now anticipates deployment of additional facilities in Mentasta by 3<sup>rd</sup> quarter 2012, with additional sites in Tatitlek 3<sup>rd</sup> quarter 2013, and McCarthy and Chitna by 3<sup>rd</sup> quarter 2013. ACS- W has also used its 2011 USF support to upgrade its CDMA facilities in Copper Valley to upgrade batteries.

- h) **Alaska Power and Telephone Study Area.** ACS-W has used its 2011 USF support to upgrade its CDMA facilities, including adding Rev-A and EVDO capabilities for numerous sites, added increased sectorization and capacity to improve wireless coverage. Klukwan was completed in 2011. Hyder, Meyers Creek, and Edna Bay are planned for completion in 2012.

(D): An explanation regarding network improvement targets that have not been fulfilled and identification of any unserved areas.

**ACS-W has completed all planned network improvements as scheduled. ACS-W continually schedules network optimization.**

(E): An explanation of any revisions to the previously filed network deployment plan.

**Prior to the economic downturn, ACS-W had completed a majority of its build-out in the Copper Valley Telephone study area. Resource constraints, delays in negotiation and coordination of backhaul for 2012 should result in the deployment of an additional sites in Mentasta, Tatitlek, McCarthy and Chitna exchanges has been delayed. ACS W also spent much of the 2011 construction season upgrading batteries to meet its October deadline.**

(D): An explanation regarding network improvement targets that have not been fulfilled and identification of any unserved areas.

**ACS-W has completed all planned network improvements as scheduled. ACS-W continually schedules network optimization.**

(E): An explanation of any revisions to the previously filed network deployment plan.

**Prior to the economic downturn, ACS-W had completed a majority of its build-out in the Copper Valley Telephone study area. Resource constraints, delays in negotiation and coordination of backhaul for 2012 should result in the deployment of an additional sites in Mentasta, Tatitlek, McCarthy and Chitna exchanges has been delayed. ACS W also spent much of the 2011 construction season upgrading batteries to meet its October deadline.**

**3 AAC 53.460(a)(3):** An explanation of each instance in which a customer was denied supported services and a detailed explanation of the steps taken to provide service.

**ACS-W provides service throughout its ETC serving area to all customers requesting service, subject to coverage. ACS-W continually optimizes its network to improve coverage.**

**3 AAC 53.460(a)(4):** The number of complaints to the commission or the Federal Communications Commission by study area and service area, comparing the number of complaints to the total number of handsets or lines served by the carrier by study area and service area.

	Anchorage	Copper Valley	Fairbanks	Glacier State	Greatland	Juneau	Ketchikan	MTA	APT
Total Complaints		1							
Total Handsets*	53,156	779	13,427	29,709	350	4,595	1,966	16,124	1,924

\* Total handsets as of December 31, 2011

**3 AAC 53.460(a)(7):** Copies of any outage reports mandated by the commission or the Federal Communications Commission.

**ACS-W had one outage report to file for 2011.**

**3 AAC 53.460(a)(9):** Affidavits of publication from the prior calendar year demonstrating that the common carrier advertised the availability of supported services throughout the eligible telecommunications carrier service area.

**ACS-W ran advertisements in its serving area regarding the availability of supported services in June 2011. Please see Exhibit C.**

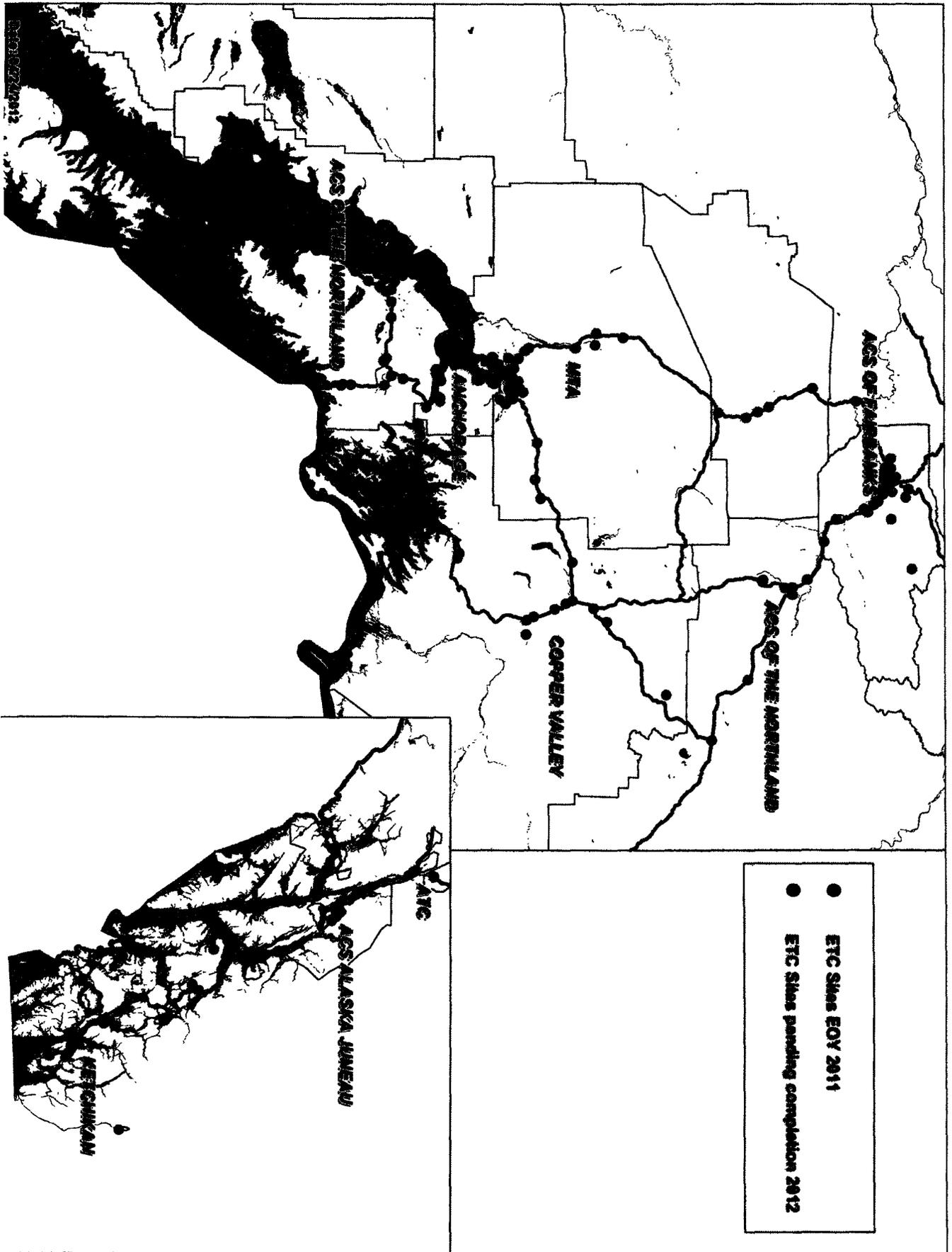


EXHIBIT A

**Exhibit B**

ACS Wireless, Inc.  
2011 Network Improvements  
April 24, 2012

**Table 1. Network Improvements**

	Complete 2011 CETC Revenue	New Site & Acquisition Expenditures	Switching / Optimization software	3G upgrades/ sectoring	Total 2011 ACS Wireless CapEx	Second Carrier Leased Circuits	Second Carrier Call Termination	Operations and Maintenance	Building, Land, and Site Leases	COGS	Total 2011 ACS Wireless OpEx	Spending Above / (Below) CETC Support
ACS OF ANCHORAGE	3,118,079											29,622,799
COPPER VALLEY TEL	1,417,525											2,140,355
ACS-FAIRBANKS, INC.	1,795,582											8,668,345
ACS-N GLACIER STATE	7,345,308											19,714,468
ACS-AK JUNEAU	535,827											2,643,109
KETCHIKAN PUBLIC UT	1,395,180											2,299,145
MATANUSKA TEL ASSOC	7,432,216											14,422,482
ACS-AK GREATLAND	78,884											263,109
APT	730,344											2,392,492
<b>Total</b>	<b>23,848,946</b>											<b>82,166,304</b>

REDACTED

**Table 2. 2011 New Site Build (NSB) and Site Acquisition Summary**

Summary	Project Name	Total 2011 ETC Spend	Incumbent Telephone Company
2011 NSB	2011 KINCAID 2 SITE BUILD -		ACS of ANCH
2011 NSB	GLEN WEIGH STATION CDMA ADD		ACS of ANCH
2011 NSB	KEYCENTER CDMA BUILD 2010-		ACS of ANCH
2011 NSB	NORTHERN LTS/BONIFACE CDMA ADD		ACS of ANCH
2011 NSB	TURNAGAIN CDMA ADD-		ACS of ANCH
2011 NSB	HERNING ROAD		ACS-Fairbanks
2011 NSB	MENTASTA NEW BUILD		ACS-Fairbanks
2011 NSB	MILLER HILL (FMRS LOOP II)-		ACS-Fairbanks
2011 NSB	COLLEGE ROAD CDMA AD		ACS-Fairbanks
2011 NSB	MAUD ROAD CDMA BUILD 2010-		MTA
2011 NSB	SETTLERS BAY CDMA ADD -		MTA
2011 SA	2010 PRE-ENGINEERING		ACS of ANCH
2011 SA	LTE SITE PREP WORK 2011		ACS of ANCH
2011 SA	2010 PRE-ENGINEERING		ACS-AK (J)
2011 SA	LTE SITE PREP WORK 2011		ACS-AK (J)
2011 SA	2010 PRE-ENGINEERING		ACS-Fairbanks
2011 SA	LTE SITE PREP WORK 2011		ACS-Fairbanks
2011 SA	2010 PRE-ENGINEERING		ACS-N (GS)
2011 SA	LTE SITE PREP WORK 2011		ACS-N( GS)
2011 SA	2010 PRE-ENGINEERING		MTA
2011 SA	LTE SITE PREP WORK 2011		MTA
2011 SE	2011 EVDO DOM ADDS		ACS AK (G)
2011 SE	2011 EVDO DOM ADDS		ACS of ANCH
2011 SE	C & INTERNATIONAL RELOCATION		ACS of ANCH
2011 SE	MINESOTA & DIMOND RELOCATION		ACS of ANCH
2011 SE	NORTH TERMINAL RELO -		ACS of ANCH
2011 SE	PROVIDENCE HOSP DAS EXPANSION		ACS of ANCH
2011 SE	2011 EVDO DOM ADDS		ACS-Fairbanks
2011 SE	2011 EVDO DOM ADDS		ACS-N (GS)
2011 SE	2011 EVDO DOM ADDS		ATC
2011 SE	2011 EVDO DOM ADDS		KPU
2011 SE	2011 EVDO DOM ADDS		MTA
2011 SE	ASPHALT PAVING - BUTTE CELL SITE		MTA

REDACTED

**Annual ETC Reporting Requirements**

**3 AAC 53.460**

**Certification Statement of Compliance with 3 AAC 53.460(6)**

**ACS of Wireless, Inc.**

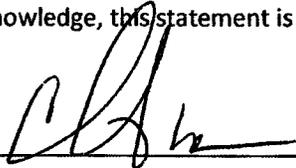
ACS of Wireless, Inc., as a common carrier and an Eligible Telecommunications Carrier (ETC), is in compliance with the requirements set out in 3 AAC 53.410(a)(12) regarding functionality in emergency situations.

ACS of Wireless, Inc. maintains a minimum of eight (8) hours of backup power in order to ensure functionality without local AC commercial power.

ACS of Wireless, Inc. has established, to the extent feasible, the ability to reroute traffic around damaged facilities and to manage traffic spikes resulting from emergency situations.

ACS of Wireless, Inc. has established procedures for employees to follow in an emergency to prevent or minimize interruption or impairment of telecommunications services.

I, Chris Burns, Vice President of Field Operations for ACS of Wireless, Inc., certify that, to the best of my knowledge, this statement is true for the calendar year 2011.



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Chris Burns  
VP, Field Operations

4/2/12

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Date

**Annual ETC Reporting Requirements  
3 AAC 53.460**

**Initial Certification Statement of Compliance with 3 AAC 53.410(a)(7), (16), and (17)  
ACS Wireless, Inc.**

ACS Wireless, Inc., in compliance with 3 AAC 53.410(a)(7), commits to provide service on a timely basis to customers requesting service throughout its ETC study area using its own facilities or a combination of its own facilities and resale in accordance with its network deployment plan filed under 3 AAC 53.420 and revised annually under 3 AAC 53.460(a)(1).

In any instances where ACS Wireless, Inc. is unable to fulfill a customer request for service, ACS Wireless, Inc. commits to file this data annually under 3 AAC 53.460(a)(3).

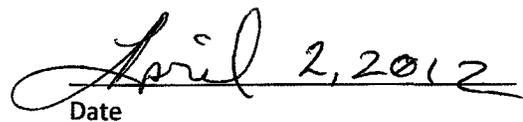
ACS Wireless, Inc., in compliance with 3 AAC 53.410(a)(16), acknowledges that it may be required to provide equal access to long distance carriers if no other ETC provides equal access within the ETC service area.

ACS Wireless, Inc., in compliance with 3 AAC 53.410(a)(17), regarding universal service support for high-cost areas, commits to use that high-cost universal service support for the provision, maintenance, and upgrade of facilities and services that benefit the ETC service area from which the support was derived.

I, Amy Gardner, Vice President of Revenue Assurance for ACS Wireless, Inc., certify that, to the best of my knowledge, these statements are true for the calendar year 2011.

  
\_\_\_\_\_  
Amy Gardner

VP, Revenue Assurance

  
\_\_\_\_\_  
Date

**Annual ETC Reporting Requirements  
3 AAC 53.460**

**Certification Statement of Compliance with 3 AAC 53.460(5), 3 AAC 53.410(a)(14) and 3 AAC 53.460(3)  
ACS Wireless, Inc.**

ACS Wireless, Inc., as a common carrier and an Eligible Telecommunications Carrier (ETC), is in compliance with the applicable consumer protection and service quality standards as set out in 3 AAC 53.450.

ACS Wireless, Inc. maintains multiple business offices within its ETC service area, with its main branch located at 600 36th Avenue, Anchorage, AK. These offices are staffed during Commission business hours with personnel who can assist customers with their service needs and who represent the carrier. ACS Wireless, Inc. also maintains a local and a toll-free number by which customers may reach personnel for assistance with their service needs.

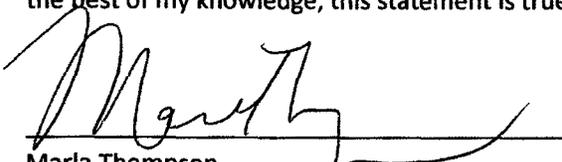
ACS Wireless, Inc. maintains consumer complaint procedures on their website for access by customers. Consumers may go to <http://www.alaskacommunications.com> and access our Frequently Asked Questions, or use a web-form to contact ACS Wireless, Inc. directly with a specific question.

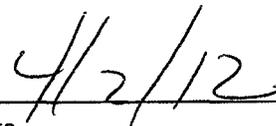
ACS Wireless, Inc. complies with 3 AAC 53.410(a)(14) by offering one or more calling plans comparable to those of the incumbent local exchange carrier in its ETC serving area, including a calling plan with at least 500 free minutes of local usage per month.

ACS Wireless, Inc., as a common carrier and an Eligible Telecommunications Carrier (ETC), provided service throughout its ETC serving area to all customers requesting service, whenever possible.

Any instances where requested service was not provided have been detailed in this Annual ETC filing, as required by 3 AAC 53.460(3).

I, Marla Thompson, Vice President of Consumer Sales and Service for ACS Wireless, Inc., certify that, to the best of my knowledge, this statement is true for the calendar year 2011.

  
\_\_\_\_\_  
Marla Thompson  
VP, Consumer Sales & Service

  
\_\_\_\_\_  
Date

# If you're eligible for Lifeline, Alaska Communications has you covered.

\$1 per month basic wireline or wireless service.

With Lifeline wireless, get unlimited talk in Alaska Communications' Lifeline service area, Nationwide text and a free phone all for just \$1 a month.

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## Lifeline Plan includes:

A one-time Link-up service discount for basic wireline home phone or wireless service  
Alaska Communications best-in-class services at a reduced rate  
Free and affordable phones available for wireless Lifeline customers

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Depending on where you live, and if you're a qualified recipient of a public assistance program or meet household income level requirements, you may be eligible for Alaska Communications Lifeline service. Only one Lifeline service is allowed per household. Taxes and fees apply.

Call 800-803-8083, visit any store, or get more information at [alaskacommunications.com](http://alaskacommunications.com)



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Lifeline service not available in all areas. Subject to local taxes & fees. Service is based on ACS Lifeline network coverage areas. ACS companies are eligible telecommunications carriers and provide basic phone Lifeline and Link-up service in the Alaska Communications' Lifeline service area served by ACS of Anchorage, Inc., ACS of Fairbanks, Inc., ACS of Alaska, Inc., and ACS of Northland, Inc. ACS Wireless, Inc. can also provide wireless Lifeline and Link-up service in the areas served by ACS of Anchorage, Inc., ACS of Fairbanks, Inc., ACS of Alaska, Inc., ACS of Northland, Inc., Glacier State, Alaska Telephone Company, Inc., Copper Valley Telephone Cooperative, Inc., Ketchikan Public Utilities and Matanuska Telephone Association.

ALAS2608  
L42367  
\$2970.75

# AFFIDAVIT OF PUBLICATION

STATE OF ALASKA  
THIRD JUDICIAL DISTRICT

Hope Bauman  
being first duly sworn on oath  
deposes and says that he is  
a representative of the  
Anchorage Daily News, a  
daily newspaper. That said  
newspaper has been approved  
by the Third Judicial Court,  
Anchorage, Alaska, and it now  
and has been published in the  
English language continually as a  
daily newspaper in Anchorage,  
Alaska, and it is now and during  
all said time was printed in an  
office maintained at the aforesaid  
place of publication of said  
newspaper. That the annexed is  
a copy of an advertisement as it  
was published in regular issues  
(and not in supplemental form)  
of said newspaper on

Thursday June 30, 2011

and that such newspaper was  
regularly distributed to its  
subscribers during all of said  
period. That the full amount of  
the fee charged for the foregoing  
publication is not in excess of  
the rate charged private individuals.

Signed Hope Bauman

Subscribed and sworn to before

me this 30 day of June

20 Britney Thompson

Notary Public in and for  
The State of Alaska.  
Third Division  
Anchorage, Alaska  
MY COMMISSION EXPIRES

5-18-2015



# PUBLISHER'S AFFIDAVIT

UNITED STATES OF AMERICA, }  
STATE OF ALASKA } ss:

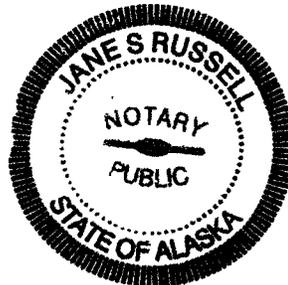
Denise Reece being first duly sworn, on oath deposes and says:

That I am and was at all times here in this affidavit mentions, Supervisor of Legals of the Peninsula Clarion, a newspaper of general circulation and published at Kenai, Alaska, that the If You're Eligible for Lifeline

a printed copy of which is hereto annexed was published in said paper one each and every day for one successive and consecutive day in the issues on the following dates:  
June 30, 2011

x Denise Reece  
SUBSCRIBED AND SWORN to me before this 14th day of July, 2011

Jane Russell  
NOTARY PUBLIC in favor for the State of Alaska.  
My Commission expires 26-Aug-12



# Publisher's Affidavit

**UNITED STATES OF AMERICA**

State of Alaska

SS:

I, the undersigned, being first duly sworn, depose and say: I am Editor or Publisher of the Kodiak Daily Mirror, a daily newspaper published in Kodiak, Third Judicial Division, State of Alaska, and that the annexed printed notice was published in said newspaper in issues of the following dates:

6/30/2011

X



Signature of Editor or Publisher

SUBSCRIBED AND SWORN to before

me this 19<sup>th</sup> day of July, 2011

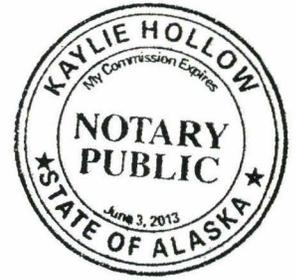


NOTARY PUBLIC in and for the State of

Alaska.

My Commission expires 3/1/13





# AFFIDAVIT OF PUBLICATION

UNITED STATES OF AMERICA }  
STATE OF ALASKA } SS.  
FOURTH DISTRICT }

Before me, the undersigned, a notary public, this day personally appeared Marena Burnell, who, being first duly sworn, according to law, says that he/she is an Advertising Clerk of the Fairbanks Daily News-Miner, a newspaper (i) published in newspaper format, (ii) distributed daily more than 50 weeks per year, (iii) with a total circulation of more than 500 and more than 10% of the population of the Fourth Judicial District, (iv) holding a second class mailing permit from the United States Postal Service, (v) not published primarily to distribute advertising, and (vi) not intended for a particular professional or occupational group. The advertisement which is attached is a true copy of the advertisement published in said paper on the following day(s):

6/30/11

VITRO AGENCY  
ACS

63 i

LIFELINE  
234784

40383448

and that the rate charged thereon is not excess of the rate charged private individuals, with the usual discounts.

Subscribed and sworn to before me on this 19 day  
of July, 2011

Notary Public in and for the State Alaska.

My commission expires June 3, 2013

PUBLISHER'S AFFIDAVIT

UNITED STATES OF AMERICA )  
STATE OF ALASKA )  
: SS.  
FIRST JUDICIAL DISTRICT )

Before me, the undersigned, a notary public this day personally appeared Ron Loesch who, being first duly sworn, according to law, says that he/she is the publisher of Wrangell Sentinel published at Wrangell in said Division First Judicial and State of Alaska and that the advertisement, of which the annexed is a true copy, was published in said publication on the 30 day of June 2011, and thereafter for \_\_\_\_\_ week/s, the last publication appearing on the 30 day of June 2011, and that the rate charged thereon is not in excess of the rate charged private individuals.

*Ronald J. Loesch*

Subscribed and sworn to before me

This 1 day of July 2011

*Elizabeth K. Loesch*

6 of 8

**EXHIBIT C**





COPPER RIVER RECORD  
P.O. BOX 277  
GLENNALLEN, ALASKA 99588  
PHONE: 907-259-5277  
EMAIL: CONTACT@COPPERRIVERRECORD.NET

### Affidavit of Publication

RE: Lifeline Ad 06/30/11 issue CLR

UNITED STATE OF AMERICA

STATE OF AK ss

THIRD JUDICIAL DIVISION.

BEFORE ME, THE UNDERSIGNED, A NOTARY PUBLIC THIS DAY PERSONALLY

APPEARED Matthew Lorenz WHO, BEING FIRST DULY SWORN,

ACCORDING TO THE LAW, SAYS THAT HE/SHE IS THE Owner/Publisher OF

THE COPPER RIVER RECORD AT GLENNALLEN IN SAID DIVISION

THIRD JUDICIAL AND STATE OF ALASKA

AND THAT THE ADVERTISEMENT, OF WHICH THE ATTACHED IS A TRUE COPY, WAS

PUBLISHED IN SAID PUBLICATIONS ON THE 30<sup>th</sup> DAY OF June, 2011.

[Signature]

July 20, 2011

SUBSCRIBED AND SWORN TO BEFORE ME THIS \_\_\_\_\_ DAY OF \_\_\_\_\_,

SIGNED \_\_\_\_\_ NOTARY PUBLIC FOR STATE OF ALASKA.

MY COMMISSION EXPIRES ON \_\_\_\_\_.

