FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

October 11, 2012

Via E-mail

Lisa Phillips
ACS Wireless
600 Telephone Avenue MS #60
Anchorage, AK 99503

Re: Applications of GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. for Consent to the Assignment of Licenses to Alaska Wireless Network, LLC (WT Docket No. 12-187 and WC Docket No. 09-197)

Dear Ms. Phillips:

GCI Communication Corp. ("GCI"), ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. have filed applications pursuant to section 310(d) of the Communications Act of 1934, as amended,[1] seeking Commission consent to the assignment of licenses to the Alaska Wireless Network, LLC, an indirect wholly-owned subsidiary of GCI.[2] In order for the Commission to complete its review of the applications and make the necessary public interest findings under section 310(d) of the Communications Act,[3] we require additional information and clarification of certain matters discussed in the applications and other information provided to the Commission. If necessary, we will follow up with additional requests for information.

Accordingly, pursuant to section 308(b) of the Act,[4] 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, and each page should be marked with a corporate identification and consecutive document control numbers as specified in the attached instructions. We would appreciate receiving your response to each inquiry no later than October 25, 2012.

Your responses should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, in WT Docket No. 12-187. In addition, the Comment Public Notice and the protective orders in this proceeding[5] require the submission of multiple copies of all *ex parte* and other filings

---

[1] 47 U.S.C. § 310(d).

[2] *See* GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. Seek FCC Consent to the Assignment of Licenses to the Alaska Wireless Network, LLC, WT Docket No. 12-187, WC Docket No. 09-197, *Public Notice*, DA 12-1382 (rel. Aug. 22, 2012) ("Comment Public Notice").

[3] 47 U.S.C. § 310(d).

[4] 47 U.S.C. § 308(b).

[5] *See* Applications of GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. For Consent To Assign Licenses to The Alaska Wireless Network, LLC, WT Docket No. 12-187, *Protective Order*, DA 12-1061 (WTB rel. July 3, 2012); Applications of GCI Communication Corp., ACS

submitted in this proceeding. The Wireless Telecommunications Bureau also should receive, at a minimum, two copies of all paper filings. This requirement does not apply, however, to the submission of documents produced in a form compatible with the Commission's document review software as described in the attached instructions, for which only one electronic copy shall be submitted. If you submit information pursuant to one or both of the protective orders issued in this case, you should deliver to Kathy Harris of the Wireless Telecommunications Bureau two copies of the unredacted documents marked "Highly Confidential – Subject to Protective Order in WT Docket No. 12-187 before the Federal Communications Commission" or "Confidential Information – Subject to Protective Order in WT Docket No. 12-187 before the Federal Communications Commission," as applicable, and two copies of the redacted documents marked "Redacted – For Public Inspection," as required by the protective orders in this proceeding. For any electronic filings made using the Commission's Electronic Comment Filing System ("ECFS"), parties also should serve the documents via e-mail to Kathy Harris, kathy.harris@fcc.gov; Paroma Sanyal, paroma.sanyal@fcc.gov; Jennifer Tatel, jennifer.tatel@fcc.gov; and Jim Bird, TransactionTeam@fcc.gov.

If you have any questions regarding this matter, please contact Kathy Harris, Wireless Telecommunications Bureau, at (202) 418-0609; Paroma Sanyal, Office of Strategic Planning and Policy Analysis, at (202) 418-2425; or Jennifer Tatel, Office of General Counsel, at (202) 418-1817.

Sincerely,

Ruth Milkman
Chief, Wireless Telecommunications Bureau

Attachment

cc: Karen Brinkmann

Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. For Consent To Assign Licenses to The Alaska Wireless Network, LLC, WT Docket No. 12-187, *Second Protective Order*, DA 12-1060 (WTB rel. July 3, 2012).

WT Docket Number 12-187
INFORMATION AND DISCOVERY REQUEST FOR
ALASKA COMMUNICATIONS SYSTEMS GROUP, INC.

1. Provide a timetable for the Proposed Transaction from when it was first proposed to the present. Explain what assets will be purchased by GCI from ACS for $100 million, and submit all documents discussing the valuation of ACS's assets. Provide all documents discussing the Proposed Transaction (except those discussing solely environmental, tax, human resources, OSHA, or ERISA issues), including but not limited to:
    a. all minutes of the Board of Directors of your Company;
    b. all documents reviewed by your Company's Board; all terms and conditions were the Proposed Transaction not to be consummated including how the termination fees were determined; and the actions that must be taken prior to consummation;
    c. changes in your Company's operations, structure, policies, strategies, product offerings, pricing, bundling, corporate goals, financing, business, officers, employees, network integration, wireless deployment, or any other area of corporate activity as a result of the Proposed Transaction;
    d. merger simulations, econometric modeling, or similar analyses and the underlying data;
    e. the effect of the Proposed Transaction on customers, competitors, potential competitors or suppliers; and
    f. to the extent not already provided, all other agreements between the Applicants and attachments thereto, including all standalone agreements.

2. The Applicants state that the Proposed Transaction provides many public interest benefits, including operational savings, benefits in roaming services, and the acceleration of coverage. Provide all documents discussing:
    a. any savings and other cost synergies referred to in the Public Interest Statement and the timeframes in which they would be realized. Further, (i) provide a quantification of any operational savings or cost synergy and an explanation of how the quantification was calculated; and (ii) state the steps that the Company anticipates taking to achieve that operational savings or cost synergy, and the estimated time and costs required to achieve it. For each cost savings, state separately the one-time fixed cost savings, recurring fixed cost savings, and variable cost savings (in dollars per subscriber and dollars per year);
    b. cost savings resulting from a reduction in roaming between the Applicants as a result of the Proposed Transaction and through increased bargaining power in negotiating roaming agreements;
    c. your Company's deployment of 4G LTE both individually and as a result of the Proposed Transaction, including coverage and timing;
    d. capacity enhancements, ways to improve spectral utilization and efficiency, new cell sites, cell site upgrades, sectorization, antenna modifications, tower maintenance and improvements, transport upgrades, and switching upgrades;
    e. network reliability and resiliency, the integration or interconnection of networks, switching facilities, cell sites, and backhaul; and
    f. the criteria to be used to consolidate cell sites.

3. Provide all documents discussing the Company's or any competitor's pricing decisions, including: (a) pricing plans, policies, forecasts, strategies, analyses, and decisions;

(b) introduction of new pricing plans or promotions; (c) tiered pricing; and (d) bundled pricing.

4. For any relevant wireless service or any relevant wireless product in any relevant area, provide all documents discussing the Company's or any competitor's:
    a. strategic, marketing, sales or business plans on the competitive position of the Company or any existing or potential competitor, including but not limited to advertising and marketing, spectrum holdings, and network capacity;
    b. other plans to reduce costs, improve services or products, improve service quality, improve capacity to transmit mobile wireless services, introduce new services or products, research, development or innovation;
    c. budgets and financial projections on a statewide and sub-statewide basis; and
    d. presentations regarding the Company's competitive, financial or strategic position to management committees, executive committees, boards of directors, investors, investor analysts, bankers and industry analysts.

5. For any relevant wireless service or any relevant wireless product in any relevant area, provide all documents discussing the Company's or any competitor's:
    a. buyer substitution responses to price or product changes, including all analyses of elasticities of demand;
    b. churn and subscriber acquisition and retention;
    c. data or studies indicating that a customer left or switched to the Company and the reasons for the switch;
    d. any attempts to win customers from or stem losses to other mobile wireless service providers;
    e. experience or success in retaining customers;
    f. customer acquisition costs, including per gross addition costs; and descriptions or analyses of bidding results for enterprise or other large customers.
    g. share of sales or revenues of the Company or any of its competitors, including subscriber counts, gross additions, deactivations, and net additions;
    h. share of sales through various distribution channels of the Company and its competitors;
    i. competitive positioning including but not limited to how reliability, reputation, and innovation affect competition or potential competition; and
    j. how consumers or business customers or competitors view or perceive mobile wireless services or products offered by the Company or other mobile wireless service providers.

6. For any relevant wireless service or any relevant wireless product in any relevant area, provide all documents discussing:
    a. any plans of, interest in, or efforts undertaken by the Company or efforts undertaken by the Company's competitors or potential competitors for any acquisition, divestiture, joint venture, association, alliance, contract, lease, or merger of any kind involving the provision or sale of any relevant wireless product, or any relevant wireless service, other than the Proposed Transaction;
    b. any wireless MVNOs or similar resale arrangements, other wholesale, joint venture, or infrastructure sharing agreements or potential arrangements between the Company and any non-affiliated party considered by the Company or entered into prior to entering into the Proposed Transaction;
    c. any plans of, interest in, or efforts undertaken by the Company or its competitors or potential competitors to acquire spectrum;

d. the Company's analysis of, or response to, entry, potential competition, or exit of competitors; and
e. any actual or potential effect on the supply, demand, cost, or price of any relevant wireless service or any relevant wireless product as a result of the introduction by a current competitor or new entrant of: (i) any new pricing plan, (ii) relevant wireless product; (iii) relevant wireless service; or (iv) new service (such as Wi-Fi, WiMax, VoIP, or internet access service) regarded by customers as a potential substitute for any relevant product or service.

7. For each fixed wireless service offered (or planned to be offered) by AWN:
   a. describe the service, including the areas in which each service is offered, the wholesale and retail pricing plans for such service, any plans to expand such service, and whether the Company or AWN intend to offer such service on a retail basis;
   b. identify whether ACS or GCI currently offer any wireline services in the areas in which the AWN fixed wireless service would be offered by AWN, GCI or ACS;
   c. describe what assets (e.g., wireless towers) are necessary to provide the service, and identify each such asset that will be contributed to AWN as a result of the Proposed Transaction;
   d. describe whether any fixed wireless service will be offered by AWN directly to customers or whether it will be offered to customers by the Company (or both) in the event the Proposed Transaction is consummated, and describe the wholesale terms under which the Company will secure from AWN any inputs necessary to continue to provide the service to customers; and
   e. identify any restrictions contained in any contracts relating to the Proposed Transaction on the Company's ability to provide or market the service, or to expand the service into new areas.

8. Identify any person (including mobile wireless service providers) to whom the Company provides, pursuant to a roaming agreement, wholesale agreement, or other agreement, each relevant wireless service for use by that person's subscribers in a geographic area where that person does not offer mobile wireless services using its own network. Submit one complete copy of each agreement and any attachments, exhibits or amendments thereto, whether formal or informal, or letter of understanding and all documents relating to negotiation of these agreements. For each person whose subscribers used the Company's relevant wireless services, provide a list, in csv format, that includes, on a monthly basis and for each relevant area in which the relevant wireless service is provided:
   a. the name of the person;
   b. the total number of subscribers of the person using the Company's relevant wireless services;
   c. the total minutes or bytes, as relevant, of the Company's relevant wireless service used by the person's subscribers;
   d. the total amount the Company charged the person for the Company's relevant wireless service used by that person's subscribers; and
   e. for each person, the Company's total sales of roaming services, total sales of wholesale services, and total sales of other such services, in dollars, minutes of use, and in bytes of data used separately for GSM, EDGE, WCDMA, UMTS, HSPA, HSPA+, LTE, CDMA, EV-DO, and EV-DO Rev. A.

9. Identify where, as a result of the consummation of the Proposed Transaction, the Company would no longer need roaming or wholesale agreements (from any other provider).

10. Provide all documents discussing the Company's actual or potential use or provision of backhaul services or factors relevant to the Company's use or provision of such services, and competitive issues relating to backhaul services including:
    a. bids, requests, or negotiations in selling or obtaining backhaul services;
    b. the Company's or other wireless service providers' demand for backhaul services, including projected demand;
    c. the Company's provision of backhaul services (and the markets in which it provides backhaul services);
    d. other providers' supply of backhaul services;
    e. the Company's possible expansion or reduction of its backhaul network or backhaul service offerings, including the rates, terms, and conditions on which it would provision such services, as a result of the Proposed Transaction;
    f. the Company's practices when it seeks additional backhaul services, including whether it has discussed or entered into any "preferred provider" or similar arrangement with any other backhaul provider;
    g. whether and how the Company's projected need or use of backhaul services may change as a result of the Proposed Transaction;
    h. any possible modification by AWN of the terms, including prices, for providing backhaul for unaffiliated mobile wireless service providers to new or existing towers; and
    i. submit one complete copy of each agreement and any attachments, exhibits or amendments thereto, whether formal or informal, or letter of understanding and all documents relating to negotiation of any agreement.

11. The Applicants at page 15 of the Public Interest Statement claim that "[t]he infrastructure-sharing arrangement is critical to the ability of ACS Wireless and GCI to remain competitive in Alaska in the face of recent and future reductions in high-cost universal service support…" Provide all documents discussing the effects the reduction in high-cost universal service would have on the ability of the Company to provide mobile wireless services absent the Proposed Transaction.

12. Provide any cost models the Company or any third party has constructed to evaluate changes to Universal Service Funding.

13. The Applicants, at pages 7-8 of the Public Interest Statement, state that the Companies will be able to continue to provide wireless services to their existing customers under the same terms and conditions in effect prior to closing. Also, AWN will make available to the Companies new service bundles, which they can use to provide distinct new services to new and existing customers.
    a. Describe all bundled plans that your Company currently offers, both wired and wireless. Provide the number of customers that subscribe to each bundled plan.
    b. How long after closing will the new service bundles be available through the Companies?
    c. How will existing customers be transitioned to new service plans offered by the Companies or AWN? Provide all documents discussing the transition of existing customers to new service plans. Describe in detail AWN's participation in the development of retail service plans and the rates at which they are set for service

plans offered by the Companies or AWN, and provide all documents discussing AWN's development of these service plans and rates.

d. Explain how AWN's development of wireless service plans will impact your Company's bundles, service plans and pricing options. Provide all documents discussing the pricing or bundling of retail services by your company as a result of the Proposed Transaction.

14. The Applicants, at page 39, note 74 of the Public Interest Statement, claim that limited network interconnectivity will occur in the near term under a standalone commercial agreement. Explain how and when this interconnectivity will occur; why there is no need for a change in facilities ownership or control to achieve this interconnection; and the effects on competition in the relevant market.

15. Provide an unredacted copy of each submission made by the Company related to the Proposed Transaction to any regulatory body of the State of Alaska.

16. Provide an organization chart and personnel directory in effect since January 1, 2010, for the Company as a whole and for each of the Company's facilities or divisions involved in any activity relating to any relevant wireless product or any relevant wireless service.

17. Provide a list of all databases, or datasets used or maintained by the Company at any time after January 1, 2009, that constitute, record, or discuss: (a) discount requests or approvals; (b) sales personnel call reports; (c) meeting competition requests or approvals; (d) win/loss reports; (e) prices, quotes, estimates, or bids submitted to any customer; (f) the results of any bid or quote submitted to any customer or prospective customer; (g) customer relationship databases; (h) products and product codes; (i) facilities; (j) production; (k) sales; (l) prices; (m) margins; (n) costs, including production costs, development costs, distribution costs, standard costs, expected costs, opportunity costs, or customer acquisition costs; (o) patents or other intellectual property; (p) research or development projects, including expenditures and significant accomplishments.

18. Provide a list, in csv format, as of the date of this Request, for each borough or census area within Alaska, of each spectrum license that can be used in the provision of mobile wireless services that the Company: (a) holds; (b) manages; (c) contracted to acquire; (d) is in negotiations to acquire; (e) plans to transfer or assign; (f) leases to or from another person or entity; (g) holds a general partnership interest. For each license, identify the: (a) call sign; (b) FIPS Code; (c) borough; (d) market name; (e) market number (in the case of CMA, MTA, or BTA); (f) spectrum band; (g) spectrum block; (h) amount of spectrum; (i) the wireless technology format (*e.g.*, GSM, EDGE, UMTS, HSPA, HSPA+, LTE, CDMA, EV-DO, EV-DO Rev. A) deployed at present; and (j) in the Cellular and PCS spectrum, an indication of any future plans to upgrade to LTE.

19. Provide the following maps as of the date of this Request. Provide the maps in a geo-referenced format, such as a shapefile (for ArcMap) or table (for MapInfo). Provide all assumptions, methodology (e.g., propagation, field measurements), calculations (including link budgets), tools (e.g., predictive and field measurements) and data (e.g., terrain, morphology, buildings) that are used to produce the maps.

    a. by bands of the geographic coverage of each relevant wireless service provided by the Company, distinguishing by technological format (*e.g.*, GSM, EDGE, UMTS, HSPA, HSPA+, LTE, CDMA, EV-DO, EV-DO Rev. A). On these coverage maps: (1) depict in separate colors two ranges of signal levels (- 95 to -85 dBm,

and greater than -85 dBm); (2) depict all major and minor roads; and (3) indicate locations of their cell sites (color coded with frequency band);

b. earth station locations, submarine cables (including landing sites), fixed wireless networks;
c. wireline service areas;
d. areas where the Company offers a bundled product; and
e. the path of any lit or unlit fiber.

20. Provide, by borough, current and projected uplink and downlink data usage by the Company's current and projected customer base and the corresponding technologies and services currently used or projected to be used through 2015.

21. On Page 3 of the Petition for Declaratory Ruling, the Applicants state that ACS plans to seek CETC designation for additional parts of the state.

    a. Provide copies of the Alaska designation documents for both ACS and GCI.
    b. Explain what additional parts of the state of Alaska ACS plans to request the designation and the reasons for the decision to seek the designation.
    c. Explain what, if any, benefit(s) there is to consumers if the Universal Service Fund supports in those areas two competitive ETCs sharing the same facilities.
    d. Provide all documents discussing the plans of ACS to seek CETC status for additional parts of the state. Currently, ACS's service area completely overlaps that of GCI.

22. Provide data for the Company's subscribers, churn, costs, revenues, cell sites, and backhaul, as specified in Attachment A.

Definitions

In this Information and Document Request, the following terms shall have the following meanings (such meanings to be equally applicable to both the singular and plural forms of the terms defined):

1. The terms "Company" or "ACS" mean Alaska Communications Systems Group, Inc., and its parents, predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures, and all directors, officers, employees, agents, and representatives of the foregoing. The terms "parent", "subsidiary", "affiliate", and "joint venture" refer to any person in which there is partial (10 percent or more) or total ownership or control between the company and any other person.

2. The term "GCI" means General Communication, Inc., its parents, predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures, and all directors, officers, employees, agents, and representatives of the foregoing. The terms "parent", "subsidiary", "affiliate", and "joint venture" refer to any person in which there is partial (10 percent or more) or total ownership or control between the company and any other person.

3. The terms "and" and "or" have both conjunctive and disjunctive meanings.

4. The word "any" shall be construed to include the word "all," and the word "all" shall be construed to include the word "any." The word "each" shall be construed to include the word "every," and the word "every" shall be construed to include the word "each." All words used in the singular should be construed to include the plural, and all words used in the plural should be construed to include the singular.

5. The term "Applicants" means GCI and ACS, collectively.

6. The term "Application" means the applications submitted by GCI and ACS on June 18, 2012, with the lead file numbers for the wireless radio services listed as ULS File Nos. 0005257725, 0005257737, 0005259928, and 0005260034, and ITC-214-20120618-00162.

7. The term "AWN" means The Alaska Wireless Network, LLC.

8. The term "Backhaul" means the facilities that comprise the intermediate links that connect wireless network cell sites to the core network.

9. The term "CDMA" means Code Division Multiple Access technology.

10. The term "CMA" means Cellular Market Area.

11. The term "Competitor" means any actual or potential competition from any partnership, corporation (including a business trust), joint stock company, trust, unincorporated association, joint venture, limited liability company, or other entity in any relevant area for any relevant product.

12. The term "discussing" when used to refer to documents means analyzing, constituting, summarizing, reporting on, considering, recommending, setting forth, or describing a subject. Documents that contain reports, studies, forecasts, analyses, plans, proposals, evaluations, recommendations, directives, procedures, policies, or guidelines regarding a subject should be treated as documents that discuss the subject. However, documents that merely mention or refer to a subject without further elaboration should not be treated as documents that discuss that subject.

13. The term "documents" means all computer files and written, recorded, and graphic materials of every kind in the possession, custody, or control of the Company. The term "documents" includes without limitation drafts of documents, copies of documents that are not identical duplicates of the originals, and copies of documents the originals of which are not in the possession, custody, or control of the Company. The term "documents" includes, without limitation, materials of every kind in the possession, custody, or control of the Company whether created internally or externally. In addition, the term "documents" includes without limitation any amendments, side letters, appendices, or attachments. The term "computer files" includes without limitation information stored in, or accessible through, computer or other information retrieval systems. Thus, the Company should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, mainframes, servers, backup disks and tapes and archive disks and tapes, and other forms of offline storage, whether on or off the Company's premises. Electronic mail messages should also be provided, even if only available on backup or archive tapes or disks. Computer files shall be printed and produced in hard copy or produced in machine-readable form (provided that Commission staff determine prior to submission that it would be in a format that allows the Commission to use the computer files), together with instruction and all other materials necessary to use or interpret the data. Unless otherwise specified, the term "documents" excludes bills of lading, invoices, purchase orders, customs declarations, and other similar documents of a purely transactional nature and also excludes architectural plans and engineering blueprints. Where more than one identical copy of a requested document exists, the Company shall only submit one representative copy.

14. The term "EDGE" means Enhanced Data rates for GSM Evolution technology.

15. The term "EvDO" or "EvDO Rev. A" means Evolution-Data Optimized or Evolution–Data Optimized Revolution A. technology.

16. The term "GSM" means Global System for Mobile Communications technology.

17. The term "HSPA" or "HSPA+" means High Speed Packet Access or High Speed Packet Access + technology.

18. The term "identify," when used with reference to a document, means to state the date, author, addressee, type of document (e.g., the types of document, as described above), a brief description of the subject matter, its present or last known location, and its custodian, who must also be identified.

19. The term "including" shall be construed as including, but not limited to, and indicates examples to be addressed. The term should not be construed as to limit the response to only those examples listed.

20. The term "LTE" means Long Term Evolution technology.

21. The term "mobile wireless application," also referred to as "application software" or "app," means software that enables one or more functions on a mobile wireless device running a mobile operating system (e.g., Android, iOS).

22. The term "Mobile Wireless Data Services" means any data communications service using radio transmission between mobile or fixed stations and a network providing communication of packet data information, including but not limited to, broadband data, video, remote file access, status reporting, facsimile, and internet/intranet access. Mobile Wireless Data Services include non interconnected Voice over IP but exclude mobile wireless voice and text services, as defined herein.

23. The term "Mobile Wireless Services" includes Mobile Wireless Voice Services, Mobile Wireless Text Services, Mobile Wireless Data Services, and Mobile Wireless Applications.

24. The term "Mobile Wireless Text Services" means any communications service using radio transmission between mobile or fixed stations and a network providing communication of numeric or alphanumeric messages, such as multi media messaging, short messaging, and short codes. Mobile wireless text services exclude e-mails.

25. The term "Mobile Wireless Voice Services" means interconnected voice communications services provided using radio transmission between mobile or fixed stations on a wireless basis to customers, other than fixed wireless services. Mobile Wireless Voice Services include interconnected voice over Internet protocol.

26. The term "MVNO" means mobile virtual network operator.

27. The term "Person" includes the Company, and means any individual, partnership, corporation (including a business trust), joint stock company, trust, unincorporated association, joint venture, Limited Liability Company or other entity, or a government or any political subdivision or agency thereof.

28. The term "plans" means tentative and preliminary proposals, recommendations, or considerations, whether or not finalized or authorized, as well as those that have been adopted.

29. The term "Proposed Transaction" means the applications seeking consent to assign spectrum licenses from GCI and ACS to The Alaska Wireless Network, LLC and all associated contracts and agreements, including but not limited to each of the agreements referenced in The First Amended and Restated Operating Agreement of The Alaska Wireless Network, LLC or any of the attachments, exhibits, schedules thereto.

30. The term "Public Interest Statement" refers to the document filed by the Applicants entitled "Description of the Proposed Transaction & Public Interest Statement" filed June 18, 2012 and amended August 10, 2012.

31. The term "relating to" means in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying, or stating.

32. The term "Relevant Area" means, and information must be provided separately for, each Cellular Market Area in the state of Alaska, and the State of Alaska as a whole.

33. The term "Relevant Wireless Product" means, and information must be provided separately for, any of the mobile wireless services and using any of the following formats: CDMA, EV-DO, EV-DO Rev. A, LTE, GSM, EDGE, UMTS only, HSPA, and HSPA+:
    1) feature mobile devices: wireless handset devices that are cable of supporting voice services as well as text services;
    2) smartphones: wireless handset devices other than iPhones, with advanced computing capability and connectivity sufficient to run complete mobile operating system software (e.g., Android, Research in Motion Ltd. Blackberry, Windows phone) to support all mobile wireless services, including broadband data and video applications as well as voice, photographic cinematic, and audio-visual media player services (including books, periodicals, movies, music, games);
    3) iPhones: smartphones designed and marketed by Apple Inc.;
    4) tablet PCs (includes netbook PCs): portable devices (other than iPads) with touch screen and/or a QWERTY keyboard input, and advanced computing capability and connectivity sufficient to run complete operating system software (e.g., Android, Windows) to support broadband data and video applications as well as photographic, cinematic, and audio-visual media player services (including books, periodicals, movies, music, games);
    5) iPads: tablet PCs designed by Apple Inc.;
    6) e-readers: portable personal computing devices with a display size of 6" to 10" typically, with advanced computing capability and connectivity sufficient to enable users to shop for, purchase, download, and display text, designed primarily for the purpose of reading books, newspapers, and periodicals;
    7) "air cards" (also referred to as "laptop cards"): portable wireless modems that enable personal computing devices to connect to a mobile wireless network in order to support and deliver voice, data, and video services;
    8) mobile hotspots devices: network routing devices that enable portable, Wi-Fi enabled handset and personal computing devices to connect to a mobile wireless network in order to support and deliver voice, data, and video services; and
    9) other mobile wireless devices not listed above. Describe the other devices included in this category.

52. The term "Relevant Wireless Service" means, and information must be provided separately for, any of the services identified below and using any of the following formats: CDMA, EVDO, EVDO Rev. A, LTE, GSM, EDGE, UMTS only, HSPA, and HSPA+:
    1) mobile wireless voice services;
    2) mobile wireless text services;
    3) mobile wireless data services;
    4) mobile wireless applications; and
    5) fixed wireless services.

53. The term "SMS" means short message service.

54. The term "subsidiary" as to any Person means any corporation, partnership, joint venture, limited liability company, or other entity of which shares of stock or other ownership interests having ordinary voting power to elect a majority of the board of directors or other managers of such corporation, partnership, joint venture, limited liability company or other entity are at the time owned, or the management of which is otherwise controlled, directly or indirectly, through one or more intermediaries, or both, by such Person.

55. "United States" or "U.S." means the United States, its possessions, territories, and outlying areas.

56. "Wi-Fi" means the IEEE 802.11 family of standards.

Instructions

1. Unless otherwise specified, all Information and Document Requests cover the period from January 1, 2010 through the present.

2. Corporations and other entities, including affiliated or subsidiary entities, shall be identified by the Central Index Key ("CIK") assigned by the Securities and Exchange Commission ("SEC"). A unique identifier should be used for each entity that has not been assigned a CIK by the SEC.

3. Submit responses to Information Requests in both paper and electronic form, unless an electronic form is specified (*e.g.*, electronic spreadsheet). Submit responses to Document Requests (including materials containing Highly Confidential or Confidential Information) in electronic form only in a manner that is fully compatible with the Commission's Summation Enterprise software database, as set forth in the Instructions for Submission of Electronic Documents. The Commission does not require the submission of paper copies of these documents at this time, but reserves the right to require their submission at a later time.

4. Each requested document shall be submitted in its entirety, even if only a portion of that document is responsive to a request made herein. This means that the document shall not be edited, cut, or expunged, and shall include all appendices, tables, or other attachments, and all other documents referred to in the document or attachments. All written materials necessary to understand any document responsive to these requests shall also be submitted. Provide final versions of each document; however, if a final version does not exist provide one copy of the latest draft of the document.

5. Those documents written in a language other than English must be translated into English; automated or machine translations are not permitted. Submit the foreign language document, with the English translation attached thereto.

6. Unless otherwise specified, provide data and interrogatory responses separately for prepaid, post-paid, wholesale, and all mobile wireless services.

7. Data provided in response to this Request should include a list of all parameters/assumptions on which the data are based.

8. Unless otherwise agreed to by the Commission, requests for the production of documents (and any particular type of document) require the production of all responsive documents in the possession, custody, or control of the Company.

9. For each document or statement submitted in response to the requests, indicate, by number and subsection, the request to which it is responsive and, for documents, identify the Person(s) from whose files the document was retrieved (*i.e.*, custodian). Group submitted materials according to the request number to which they are responsive and then, within each of those request-number groupings, by the appropriate custodian. If a document is responsive to more than one request, submit the document in response to the first request to which it is responsive, and, in accordance with the Instructions for Submission of Electronic Documents below, indicate in the metadata accompanying the document's electronic record all subsequent requests to which it also is responsive. If any document is not dated, if known, state the date on which it was prepared. If any document does not identify its author(s) or recipient(s), provide, if known, the name(s) of the author(s) or recipient(s) as metadata in accordance with Instructions for Submission of Electronic Documents. The Company must identify with reasonable specificity all documents provided in response to these requests. Where more than one identical copy of

a requested document exists, the Company may submit only one representative copy, but in all cases all metadata, including without limitation all custodians who possessed identical documents withheld, must be provided in accordance with the provisions of Instructions for Submission of Electronic Documents.

10. If search terms were used to conduct all or any part of a search conducted in response to this Information Request, provide a list of search terms used, along with a glossary of industry and company terminology. In addition, describe the search methodologies and the applications used to execute the search.

11. The specific requests made herein are continuing in nature. The Company is required to produce in the future any and all documents and information that are responsive to the requests made herein but not initially produced at the time, date, and place specified herein. In this regard, the Company must supplement its responses (a) if the Company learns that, in some material respect, the documents and information initially disclosed were incomplete or incorrect or (b) if additional responsive documents or information are acquired by or become known to the Company after the initial production.

12. Any documents that are withheld in whole or in part from production based on a claim of privilege shall be assigned document control numbers (with unique consecutive numbers for each page of each document). For any page of any Document that the Company has designated to be withheld as entirely privileged, the Company shall submit a substitute, placeholder page that lists only the Document ID of the page that was withheld in entirety as privileged and a statement indicating that the page has been withheld in entirety as privileged. For any document withheld as entirely privilege, it is sufficient to supply one substitute, placeholder page for that document, so long as the range of Document IDs for the entire document is listed on the placeholder page and each Document ID for each page of the document is reflected in metadata. The placeholder pages must be OCR'd as any other paper record, as described above. For each document withheld as privileged, whether in entirety or in part, the Company shall code the substitute document submitted as specified in and provide as metadata the information in the attached MetaData Table of Requested Fields.

13. For each Document identified on the Company privilege log:

    1) Provide the document control number(s);
    2) Identify all authors of the document;
    3) Identify all addressees of the document;
    4) Identify all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
    5) Provide the date of the document;
    6) Provide a description of the subject matter of the document;
    7) State the nature or type of the privilege that the Company is asserting for the document (e.g., "attorney-client privilege");
    8) Provide the number(s) of the Request to which the document is responsive;
    9) Provide the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
    10) State whether the document has been produced in redacted form, and include the range of Document ID labels for those produced documents.

14. The Company's privilege log shall also conform with all of the following requirements:

    1) Provide a separate legend identifying each author, addressee, and recipient identified on the Company's privilege log.

2) Identify on the privilege log, and denote with an asterisk, all attorneys acting in a legal capacity with respect to the withheld document or communication.
3) The description of the subject matter of each document shall describe the nature of the document in a manner that, though not revealing information that is itself privileged, provides sufficiently detailed information to enable the Commission to assess the applicability of the privilege claimed.
4) For each document withheld under a claim that it constitutes or contains attorney work product, also state whether the Company asserts that the document was prepared in anticipation of litigation or for trial and, if so, specify the anticipated litigation or trial upon which the assertion is based.
5) Produce all nonprivileged portions of any responsive document (including nonprivileged or redactable attachments) for which a claim of privilege is asserted, except where the only nonprivileged information in the document has already been produced. Note where any redactions in the document have been made.
6) The privilege log shall be produced in both hardcopy and electronic form, the electronic form of which shall be both searchable and sortable.
7) Documents sent solely between counsel, including in-house counsel acting solely in a legal capacity, and documents authored by the Company's outside counsel that were not directly or indirectly furnished to any third party, such as internal law firm memoranda, may be omitted from the privilege log. However, any attachments to such documents must be included on the privilege log (if a privilege is applicable to such materials), unless such attachments are addressed and sent solely to counsel.

Instructions for Submission of Electronic Documents

A. Form of Production

1. Electronic documents shall be produced in Summation Enterprise load files as images and/or native format files with extracted text and related metadata and bibliographic information. A list of metadata fields that must be populated, as relevant, is attached. Specific requirements for different types of documents are discussed below. Please contact Commission staff for further technical specifications, including the image and text file specifications and the load file configuration, and for a sample load file set.

2. Each Summation submission must be on a physical media, either a portable hard drive or DVD-ROM.

3. Each physical media provided must have a label affixed. The label shall state: (a) the name of the party submitting the data, (b) the date of the submission, (c) the volume number of production (see below), and (d) the range of documents contained on the media

4. Each Summation submission must have a volume number associated with it. On the root of the media, the top-level folder must be named for the volume. This volume number should also be indicated on the physical label of the media. The volume naming scheme should start with a 2 or 3 letter prefix (identifying your company) followed by a 3-digit counter (e.g., ABC001). Load file volumes may not contain more than 25,000 records each (but multiple file volumes may be included on one hard drive).

5. Under the volume folder, the production should be organized in 3 subfolders:

   a) IMAGES (may contain subfolders, with no more than 5,000 image files per folder) and FULLTEXT (may contain subfolders, with document-level text files). No file may be more than 25 megabytes.

   b) DOCLINK (documents in native format, including all spreadsheets and presentations)

   c) LOADFILES (the metadata, EDII, and LST information should be contained in one file, and the custodian append information in a separate file)

6. Each submission shall be accompanied by an spreadsheet (production index), in hard copy and electronic form, detailing what has been produced, by custodian and document identification number, and containing statistical information about each volume.

7. If a password is used, the same password must be used for all submissions. If encryption is used, only Truecrypt software may be used

8. To minimize any delay in loading your submissions, each submission shall be as large as practical under these specifications, while also maintaining a timely and rolling production.

9. Subsequent submissions shall not include information produced in previous submissions, unless specifically requested by the Commission. However, if an error occurs in loading, the entire load must be resubmitted, maintaining the original volume number(s). For example, if a hard drive contains volumes ABC005 – ABC 009, and there is an error with volume ABC006, ABC006 must be corrected and the entire submission ABC005 – ABC009 must be resubmitted on a new hard drive.

B. Document Types

1. Hard-copy (or paper) documents.

(a) Except as otherwise agreed, hard-copy documents shall be produced as image files with related searchable OCR text and bibliographic information.

(b) Some documents may more appropriately and efficiently be produced in hard-copy form (*e.g.*, maps).

(c) Special care should be taken to properly unitize documents, maintain attachment relationships, and indicate file folder or binder labels, consistent with the Definitions and Instructions.

2. E-mail and Other Electronic Messages.

(a) E-mail and other electronic messages (*e.g.*, instant messages ("IMs")) shall be produced as image files with related searchable text and metadata and bibliographic information.

(b) Each IM conversation shall be produced as one document.

(c) E-mail metadata shall include the folderpath ("folder" field) information for e-mail file folders into which a custodian's e-mail messages have been organized. Be sure to preserve and produce this information as specified. Beware of copying e-mails into an electronic repository or forwarding them to a central e-mail box, as such processes may destroy this information. *See also infra* Section C(2) regarding custodian metadata.

(d) Depending on how the Company's systems represent names in e-mail messages or IMs, the Commission may require a table of names or contact lists.

3. Spreadsheets shall be produced in native format (*e.g.*, .XLS files) with the first page imaged and with related searchable text and metadata and bibliographic information.

4. Presentations.

(a) Presentations shall be produced as images that show the full slide images and speaker notes, with related searchable text and metadata and bibliographic information.

(b) Presentations shall also be produced in native format (*e.g.*, .PPT files).

5. Word processing and other electronic documents not specifically addressed elsewhere in this letter shall be produced as image files with related searchable text and metadata and bibliographic information.

6. Databases.

(a) This letter does not address enterprise databases which may be responsive to the Information and Document Requests and should be the subject of a separate discussion once you have identified them.

(b) Smaller databases (*e.g.*, Microsoft Access) that are responsive should be produced, but not as part of the load-file production. Such databases should be produced separately.

7. Company Intranets and Social Networking Sites.

(a) If the Company's intranet or company social networking content (*e.g.*, Facebook, Twitter) contains responsive information, production of these items should be the subject of a separate

discussion.

(b) Depending on the nature of the information, it may be appropriate to provide the Commission direct access to the Company's intranet via a secure Internet connection, but significant technical issues are often involved.

8. Embedded files with no substantive content (e.g., corporate logos, executive "head-shot" photographs, stationery address blocks), which would appear in the production as an otherwise blank and therefore unresponsive "TIFF" image, should not be produced.

C. General Issues

1. Attachments and their parent documents are a "family" of documents. Families of documents (e.g., a cover e-mail with multiple attachments) must all be produced in full. If one member of the family is responsive, the entire family is considered responsive, and individual documents in the family cannot be withheld on grounds of being "non-responsive."

2. The required metadata for each electronic document includes "custodian" information (typically, the name of the human person from whose files the document was gathered) and "filepath" information for directory/server folders into which a custodian's documents have been organized. Ensure that this information is collected when collecting responsive documents. If the Company stores documents in a repository that does not maintain personal custodian or filepath information (*e.g.*, that "journals" e-mails), it shall be required to stipulate to custodian identities for purposes of using documents.

3. In certain circumstances, a custodian may be a shared resource (*e.g.*, shared drive or server, shared filing cabinet). Materials gathered from such repositories, to which multiple people have access, shall be produced as separate custodians. The Company shall provide a brief description of each shared resource that includes a list of the employees who have access to that shared resource. The documents in shared resources should otherwise be produced as described in the rest of this letter. (Personal share or server drives are not shared resources and shall be produced as part of each human custodian's files.)

4. Native Format Files

(a) If any native files will be produced that cannot be viewed using the standard configuration of Microsoft Office 2007, Adobe Acrobat Reader 9, WordPerfect X4, or Internet Explorer 7, you will need to notify the Commission so it can determine whether it has the appropriate software and licenses to view those files. If it does not, it may be necessary for the Company to provide that software.

(b) Any encryption or password protection shall be removed from all native format files produced.

5. Images and Text Files

(a) Images of the produced electronic documents shall conform with any further specifications provided by the Commission.

(b) Searchable OCR and extracted text from the produced electronic documents shall conform with any further specifications provided by the Commission.

(c) Care should be taken to ensure that the text files will properly format and wrap.

(d) If any document cannot be interpreted in image/text format (*e.g.*, color, Microsoft Project), the Commission may request that it be produced natively, or the Company can contact the Commission to discuss producing them natively. As noted above in C(4)(a), the Company may need to provide the appropriate software in order for the Commission to view these documents.

6. Deduplication

(a) The Company shall deduplicate vertically within each custodian's files.

(b) The Commission prefers that the Company also deduplicate horizontally across all custodians' files, but only if:

(i) the deduplication methodology preserves information on BCC recipients of e-mail;

(ii) custodian information from suppressed duplicates can be preserved and produced as a custodian append file; and

(iii) the Company, prior to beginning its production, provides a written description its deduplication methodology, including how custodial and BCC information shall be preserved and produced, to which the Commission agrees.

(c) The Company must produce all members of a family of documents (*see* C(1)) and cannot suppress attachments to other documents. In other words, the integrity of families of documents must be maintained, except as limited by any claim of privilege. For example, and in particular, the deduplication process may not remove attachments to e-mails that are being produced because the attachment is produced elsewhere. Improper dedeuplication may require the resubmission of a production set.

(d) The Company agrees not to raise any objections to the Commission's use of the produced duplicate in relation to whether it was in the files of the custodians who had the suppressed duplicates in their files or were the sender or recipients of any e-mail.

7. Privilege Designations

(a) Documents redacted pursuant to any claim of privilege shall be designated "Redacted" in the Properties field in the metadata and bibliographic information provided. The Company shall provide appropriately redacted related searchable text, metadata, and bibliographic information for these documents.

(b) Documents withheld pursuant to any claim of privilege that are part of a document family shall include a designation of "Family Member of Priv Doc" in the Properties field in the metadata and bibliographic information provided for all the other documents in its family. A placeholder image with a document identification number should be provided in place of the document.

(c) Both redacted and withheld documents shall appear on the privilege log. Each withheld document from a family shall include the family document identification number range in its entry on the privilege log.

8. Document Identification Numbering

(a) A consistent format for document identification numbering shall be used across the entire production. Document identification numbers should contain no more than three segments – *e.g.*, a company identifier, a middle segment (*e.g.*, custodian identifier), and a sequence of 6-8 digits (the number of digits should be consistent across the entire production).

(b) Document identification numbers should not contain embedded spaces (" "), slashes ("/"), backslashes ("\"), or underscores ("_"). Document identification numbers may contain hyphens ("-").

(c) Native format files should be assigned a document identification number; if images have been produced with a native format file, the beginning document identification number of the images should be the native format file's document identification number.

9. These instructions do not address or endorse any search method the Company may use to identify responsive electronic documents.

10. In order to ensure the Company's full technical and procedural compliance with these instructions, the Company shall make its Information Technology personnel and those of its vendors available to Commission staff for consultation and coordination before, during, and after its production of materials responsive to the requests.

D. Sample Submission Required Prior to Full Production

In consultation with Commission staff, the Company shall submit a test submission to ensure proper configuration of data for uploading into the Commission's Summation Enterprise database server before the Company "ramps up" production. To minimize the likelihood of encountering problems during full production, the sample must be representative of an actual production, including multiple types of documents, documents with attachments ("families"), document families from which an item has been removed pursuant to privilege (and replaced with a document identification -numbered, placeholder image), redacted documents with appropriately related searchable text, and presentation documents with speaker notes.

FIELD LISTING FOR SUMMATION METADATA LOAD FILE			TYPE OF RECORD(S) TO WHICH EACH FIELD APPLIES			
Field Name	Field Description	Field Type	Hard Copy	E-Mail	Spreadsheets and Presentations	Other E-Docs (all Attachments, Calendar Appts, Loose Files
SUBMISSION#	Production volume number (e.g., ABC001)	Note Text	x	x	x	x
REQUEST#	Request(s) to which the document is responsive	Multi-Entry	x	x	x	x
BEGDOC#	Start Bates (including prefix) -- do not use commas, underscores, ampersands, slashes, spaces, characters not allowed in Windows file names or any character used as a delimiter in the load files as part of this number	Note Text	x	x	x	x
ENDDOC#	End Bates (including prefix) -- do not use commas, underscores, ampersands, slashes, spaces, characters not allowed in Windows file names, or any character used as a delimiter in the load file as part of this number	Note Text	x	x	x	x
EPROPERTIES	Indicate All That Apply : Record Type: Loose File, E-mail, Attachment, Hard Copy, Calendar Appt Privilege Notations: Redacted, Privileged, Family Member of Priv Doc	Multi-Entry	x	x	x	x
PRIV	Privileged (Y/N)	Note Text	x	x	x	x
PO1	Subject to First Protective Order (Y/N)	Note Text	x	x	x	x
PO2	Subject to Second Protective Order (Y/N)	Note Text	x	x	x	x
DATEAPPTSTART	Start date of calendar appointment - YYYYMMDD	Date				x
TIMEAPPTSTART	Start time of calendar appointment - HH:MM am/pm	Time				x

DATEAPPTEND	End date of calendar appointment - YYYYMMDD	Date				x
TIMEAPPTEND	End time of calendar appointment -- HH:MM am/pm	Time				x
FILESIZE	File size (numeric value only - do not include unit of measure)	Integer		x	x	x
FILEEXTENSION	File extension of native electronic file	Fixed Length 5 chars		x	x	x
FILEPATH	File path to native file as it existed in original environment	Note Text		x	x	x
HASHMD5	MD5 hash value (used for deduplication or other processing)	Note Text		x	x	x
HASHSHA	SHA1 hash value (used for deduplication or other processing)	Note Text		x	x	x
SEARCHVALUES	List of search terms used to identify record as responsive (if used)	Multi-Entry	x	x	x	x
COMPANIES	Company submitting data	Multi-Entry	x	x	x	x
CUSTODIAN	Custodian(s) / source(s) -- format: Last, First or ABC Dept	Multi-Entry	x	x	x	x
DOCID	Must equal the value appearing in the BEGDOC# field	Note Text	x	x	x	x
NUMPAGES	Page count	Integer	x	x	x	x
PARENTID	Parent record's BEGDOC#, including prefix (populated ONLY in child records)	Note Text	x	x	x	x
ATTACHMENTIDS	Child document list: BEGDOC# of each child (populated ONLY in parent records)	Multi-Entry	x	x	x	x
BATESRANGE	BEGDOC# value of the parent record and ENDDOC# value (including prefix) of the last child record (for example, ABC-001 - ABC-020); populated for all documents in the group - otherwise, remains empty	Note Text	x	x	x	x
FROM	Author of the e-mail or loose electronic file (as formatted on the original)	Note Text		x	x	x
TO	Recipients of the e-mail (as formatted on the original)	Multi-Entry		x		

CC	Names of the individuals who were copied on the e-mail (as formatted on the original)	Multi-Entry		x		
BCC	Names of the individuals who were blind-copied on the e-mail (as formatted on the original)	Multi-Entry		x		
SUBJECT	E-mail or calendar subject, or electronic file's document title	Note Text		x	x	x
DATESENT	Date the e-mail was sent - YYYYMMDD	Date		x		
TIMESENT	Time e-mail was sent -- HH:MM am/pm (e.g., 09:32 am; Timezone indicators cannot be included)	Time		x		
DATERECEIVED	Date e-mail was received - YYYYMMDD	Date		x		
TIMERECEIVED	Time e-mail was received -- HH:MM am/pm	Time		x		
HEADER	The internet header information for e-mail sent through the internet;	Note Text		x		
INTERNETMSGID	Internet message identification number	Note Text		x		
MESSAGEID	Unique system identification number for the e-mail message	Note Text		x		
DATECREATED	Date electronic file was created - YYYYMMDD	Date			x	x
DATESAVED	Date electronic file was last modified - YYYYMMDD	Date			x	x
DOCDATE	Populate with: DATESAVED for electronic files (loose files and e-mail attachments) ; DATESENT for e-mails; or DATEAPPTSTART for calendar appointments - YYYYMMDD	Date	x	x	x	x
ATTACHTITLE	File name of an e-mail, e-mail attachment, or loose electronic document	Note Text		x	x	x
APPLICATION	Application used to create native file (e.g., Excel, Outlook, Word)	Note Text		x	x	x
DOCLINK	Current file path location to the native file (on the delivery medium)	Note Text			x	

FOLDER	E-mail folder path (sample: Inbox\Active); or Hard Copy folder/binder title/label	Note Text	x	x		

Format of Data

All data should be submitted in a .csv (comma-delimited) format. The sheets in the workbook provide a template for how the tables should be designed.
The required format for the entries in each column/field is indicated in the instructions for each sheet.
All entries in Text fields must be in quotation marks (e.g. "ACS", ""GCI").
Column entries in bold red indicate that the party should enter only one of the possible entries listed for that column. No other entries should be entered.
Data for all of the tables should be submitted on a periodic basis as specified in the instructions in individual tables.

"Subs Data" Table

The following data descriptions apply to the columns of the "Subs Data" table. In general, this table is intended to provide data on the number of subscribers (subs) by borough, by technology, and by customer type.

Column A: **Date**

Description: The month for which the data is being collected.
Format of Field: Text - YYYY_MM
Possible Entries:

2010_01	2011_01	2012_01
2010_02	2011_02	2012_02
2010_03	2011_03	2012_03
2010_04	2011_04	2012_04
2010_05	2011_05	2012_05
2010_06	2011_06	2012_06
2010_07	2011_07	2012_07
2010_08	2011_08	2012_08
2010_09	2011_09	2012_09
2010_10	2011_10	
2010_11	2011_11	
2010_12	2011_12	

Column B: **Borough FIPS**

Description: This field is the five-digit FIPS code - based on 2010 designations - of the borough in which subs are located.
Format of Field: Text
Example Entries: "02020", "02068", etc.

Column C: **Borough Geographic Classification**

Description: This field indicates the morphology of the area encompassed by the borough using one of the possible entries listed below. Please provide a description of the methodology used to determine these classifications in a separate attachment.
Format of Field: Text
Possible Entries: "Urban"
"Rural"

Column D: **CMA**

Description: This field represents the standard market number of the CMA in which subs are located.
Format of Field: Number - Integer
Possible Entries: Integers 187, 315, 316, 317

"Subs Data" Table

Column E: **Customer Type**

Description: This field denotes whether the subs are residential or business customers.
Format of Field: Text
Possible Entries: "Residential"
"Business"

Column F: **Service Type**

Description: This field denotes the type of service being used by the subs.
Format of Field: Text
Possible Entries: "Prepaid"
"Postpaid"
"Lifeline"
"Wholesale"

Column G: **Technology**

Description: This field denotes whether the subs are being served by a CDMA or GSM based network.
Format of Field: Text
Possible Entries: "CDMA"
"GSM"

Column H: **Voice and Text Only Subs**

Description: This field identifies the number of voice subs who DO NOT subscribe to a mobile broadband service (with the exception of text messaging) at the beginning of the time period specified in Column A.
Format of Field: Number - Integer
Example Entries: 24359, 121025, etc. (N/A if not applicable)

"Subs Data" Table

Column I: **Mobile Broadband Only Subs**

Description: This field identifies the number of mobile broadband subs (with the exception of text messaging) who DO NOT subscribe to a voice service at the beginning of the time period in specified in Column A.

Format of Field: Number - Integer

Example Entries: 24359, 121025, etc. (N/A if not applicable)

Column J: **Total Subs**

Description: This field identifies the total number of subs, including those who subscribe to voice and text only, mobile broadband only, or both types of services at the beginning of the time period specified in Column A.

Format of Field: Number - Integer

Example Entries: 24359, 121025, etc. (N/A if not applicable)

Date	Borough FIPS	Borough Geographic Classification	CMA	Customer Type	Service Type	Technology	Voice and Text Only Subs	Mobile Broadband Only Subs	Total Subs

"Churn Data" Table

The following data descriptions apply to the columns of the "Churn Data" table. In general, this table is intended to provide data on the number of subscribers (subs) and churn by technology and by customer type. In the event that data is available at a more disaggregated regional level (e.g., by borough), an additional column specifying the regional breakdown for each category should be provided.

Column A: **Date**

Description: The month for which the data is being collected.

Format of Field: Text - YYYY_MM

Possible Entries:

2010_01	2011_01	2012_01
2010_02	2011_02	2012_02
2010_03	2011_03	2012_03
2010_04	2011_04	2012_04
2010_05	2011_05	2012_05
2010_06	2011_06	2012_06
2010_07	2011_07	2012_07
2010_08	2011_08	2012_08
2010_09	2011_09	2012_09
2010_10	2011_10	
2010_11	2011_11	
2010_12	2011_12	

Column B: **Customer Type**

Description: This field denotes whether the subs are residential or business customers.

Format of Field: Text

Possible Entries:
"Residential"
"Business"

Column C: **Service Type**

Description: This field denotes the type of service being used by the subs.

Format of Field: Text

Possible Entries:
"Prepaid"
"Postpaid"
"Lifeline"
"Wholesale"

Column D: **Technology**

Description: This field denotes whether the subs are being served by a CDMA or GSM based network.

Format of Field: Text

Possible Entries:
"CDMA"
"GSM"

"Churn Data" Table

Column E: **Voice and Text Only Subs**

Description: This field identifies the number of voice subs who DO NOT subscribe to a mobile broadband service (with the exception of text messaging) at the beginning of the time period specified in Column A.

Format of Field: Number - Integer

Example Entries: 24359, 121025, etc. (N/A if not applicable)

Column F: **Mobile Broadband Only Subs**

Description: This field identifies the number of mobile broadband subs (with the exception of text messaging) who DO NOT subscribe to a voice service at the beginning of the time period specified in Column A.

Format of Field: Number - Integer

Example Entries: 24359, 121025, etc. (N/A if not applicable)

Column G: **Total Subs**

Description: This field identifies the total number of subs, including those who subscribe to voice and text only, mobile broadband only, or both types of services at the beginning of the time period specified in Column A.

Format of Field: Number - Integer

Example Entries: 24359, 121025, etc. (N/A if not applicable)

Column H: **Voice and Text Only Activations**

Description: This field identifies the number of voice activations from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also activate a mobile broadband service (with the exception of text messaging).

Format of Field: Number - Integer

Example Entries: 2435, 12102, etc. (N/A if not applicable)

Column I: **Mobile Broadband Only Activations**

Description: This field identifies the number of mobile broadband activations (with the exception of text messaging) from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also activate a voice service.

Format of Field: Number - Integer

Example Entries: 2435, 12102, etc. (N/A if not applicable)

Column J: **Total Activations**

Description: This field identifies the total number of activations from the beginning of the time period specified in Column A to the beginning of the following period, including subs who activate voice and text only, mobile broadband only, or both services.

Format of Field: Number - Integer

Example Entries: 2435, 12102, etc. (N/A if not applicable)

"Churn Data" Table

Column K: **Cost per Activation**

Description: This field identifies the cost per activation from the beginning of the time period specified in Column A to the beginning of the following period, including subs who activate voice and text only, mobile broadband only, or both services.

Format of Field: Number - 2 decimal points

Column L: **Voice and Text Only Deactivations**

Description: This field identifies the number of voice deactivations from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also deactivate a mobile broadband service (with the exception of text messaging).

Format of Field: Number - Integer

Example Entries: 2435, 12102, etc. (N/A if not applicable)

Column M: **Mobile Broadband Only Deactivations**

Description: This field identifies the number of mobile broadband activations (with the exception of text messaging) from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also deactivate a voice service.

Format of Field: Number - Integer

Example Entries: 2435, 12102, etc. (N/A if not applicable)

Column N: **Total Deactivations**

Description: This field identifies the total number of deactivations from the beginning of the time period specified in Column A to the beginning of the following period, including subs who deactivate voice and text only, mobile broadband only, or both services.

Format of Field: Number - Integer

Example Entries: 2435, 12102, etc. (N/A if not applicable)

Column O: **Cost/Revenue per Deactivation**

Description: This field identifies the cost or alternatively, revenue, per deactivation from the beginning of the time period specified in Column A to the beginning of the following period, including subs who deactivate voice and text only, mobile broadband only, or both services.

Format of Field: Number - 2 decimal points

Date	Customer Type	Service Type	Technology	Voice and Text Only Subs	Mobile Broadband Only Subs	Total Subs	Voice and Text Only Activations	Mobile Broadband Only Activations

Total Activations	Cost per Activation	Voice and Text Only Deactivations	Mobile Broadband Only Deactivations	Total Deactivations	Cost/Revenue per Deactivation

"ARPU Data" Table

The following data descriptions apply to the columns of the "ARPU Data" table. In general, this table is intended to provide data on the revenue and average revenue per user by source of revenue. In the event that data is available at a more disaggregated regional level (e.g., by borough), an additional column specifying the regional breakdown for each category should be provided.

Column A: **Date**

Description: The month for which the data is being collected.

Format of Field: Text - YYYY_MM

Possible Entries:

2010_01	2011_01	2012_01
2010_02	2011_02	2012_02
2010_03	2011_03	2012_03
2010_04	2011_04	2012_04
2010_05	2011_05	2012_05
2010_06	2011_06	2012_06
2010_07	2011_07	2012_07
2010_08	2011_08	2012_08
2010_09	2011_09	2012_09
2010_10	2011_10	
2010_11	2011_11	
2010_12	2011_12	

Column B: **Business Unit**

Description: This field indicates the particular line of business from which revenue is being received.

Format of Field: Text

Possible Entries:

"Residential Prepaid"
"Residential Postpaid"
"Business"
"Roaming"
"Backhaul"
"Satellite"
"Wholesale"
"Other"

"ARPU Data" Table

Column C: **Revenue Class**

Description: This field indicates a broad class of revenue encompassing each revenue source.

Format of Field: Text

Possible Entries:
"Voice"
"Text"
"Mobile Broadband"
"High Cost USF"
"Lifeline"
"Other USF"
"Equipment/Infrastructure"
"Devices"
"Other"

Column D: **Revenue Source**

Description: This field indicates the specific source of revenue. In general, each revenue class can contain more than one row for each specific revenue source.

Format of Field: Text

Example Entries: "Wireless Plan Fees", "Wireless Termination Fees," "Smartphone Sales", etc.

Column E: **Revenue**

Description: This field indicates the total revenue from each revenue source.

Format of Field: Number

Column F: **ARPU**

Description: This field indicates the average revenue per user for each revenue source.

Format of Field: Number - 2 decimal points

Date	Business Unit	Revenue Class	Revenue Source	Revenue	ARPU

"ACPU Data" Table

The following data descriptions apply to the columns of the "ACPU Data" table. In general, this table is intended to provide data on the cost and average cost per user by type of cost. In the event that data is available at a more disaggregated regional level (e.g., by borough), an additional column specifying the regional breakdown for each category should be provided.

Column A: **Date**

Description: The month for which the data is being collected.

Format of Field: Text - YYYY_MM

Possible Entries:

2010_01	2011_01	2012_01
2010_02	2011_02	2012_02
2010_03	2011_03	2012_03
2010_04	2011_04	2012_04
2010_05	2011_05	2012_05
2010_06	2011_06	2012_06
2010_07	2011_07	2012_07
2010_08	2011_08	2012_08
2010_09	2011_09	2012_09
2010_10	2011_10	
2010_11	2011_11	
2010_12	2011_12	

Column B: **Business Unit**

Description: This field indicates the particular line of business for which costs are being incurred.

Format of Field: Text

Possible Entries:

"Residential"
"Business"
"Roaming"
"Backhaul"
"Satellite"
"Wholesale"
"Other"

"ACPU Data" Table

Column C: **Cost Class**

Description: This field indicates a broad class of costs encompassing each type of cost incurred.

Format of Field: Text

Possible Entries:
"Interconnection Fees"
"Network Maintenance"
"Roaming"
"Access"
"Backhaul"
"Equipment/Infrastructure"
"Devices"
"Other"

Column D: **Cost Type**

Description: This field indicates the specific type of cost. In general, each cost class can contain more than one row for each specific cost type.

Format of Field: Text

Example Entries: "Wireless Equipment", "Tower Maintenance," "Data Roaming", etc.

Column E: **Cost**

Description: This field indicates the total cost from each cost type.

Format of Field: Number

Column F: **ACPU**

Description: This field indicates the average cost per user for each cost.

Format of Field: Number - 2 decimal points

Date	Business Unit	Cost Class	Cost Type	Cost	ACPU

"USF Data" Table

The following data descriptions apply to the columns of the "USF Data" table. In general, this table is intended to provide data on USF Funding by borough and by customer type.

Column A: **Date**

Description: The month for which the data is being collected.
Format of Field: Text - YYYY_MM
Possible Entries:

2010_01	2011_01	2012_01
2010_02	2011_02	2012_02
2010_03	2011_03	2012_03
2010_04	2011_04	2012_04
2010_05	2011_05	2012_05
2010_06	2011_06	2012_06
2010_07	2011_07	2012_07
2010_08	2011_08	2012_08
2010_09	2011_09	2012_09
2010_10	2011_10	
2010_11	2011_11	
2010_12	2011_12	

Column B: **Borough FIPS**

Description: This field is the five-digit FIPS code - based on 2010 designations - of the borough in which subs are located.
Format of Field: Text
Example Entries: "02020", "02068", etc.

Column C: **Borough Geographic Classification**

Description: This field indicates the morphology of the area encompassed by the borough using one of the possible entries listed below. Please provide a description of the methodology used to determine these classifications in a separate attachment.
Format of Field: Text
Possible Entries: "Urban"
"Rural"

"USF Data" Table

Column D: **CMA**

Description: This field represents the standard market number of the CMA in which subs are located.

Format of Field: Number - Integer

Possible Entries: Integers 187, 315, 316, 317

Column E: **USF Source**

Description: This field indicates the source of USF revenue. For entries market "Other", please further specify the source.

Format of Field: Text

Possible Entries: "Lifeline"
"High Cost"
"Other"

Column E: **Revenue**

Description: This field indicates the total revenue received from each USF source.

Format of Field: Number

Date	Borough FIPS	Borough Geographic Classification	CMA	USF Source	Revenue

"Site Data" Table

The following data descriptions apply to the columns of the "Site Data" table. The "Site Data" table should contain one row for every site utilized by Applicant. The site IDs in this table should correspond to the site IDs entered in the other requested tables. In the event that Applicant does not own the site utilized and information regarding Columns M-R is unavailable, N/A may be written.

Column A: **Date**

Description: The most recent date for which data is available.
Format of Field: Text - YYYY_MM

Column B: **Site ID**

Description: A unique site ID for the site to which this data record applies.
Format of Field: Text
Example Entries: "AL0001", "VA0128", etc.

Column C: **Number of Sectors**

Description: This field provides an integer representing the number of sectors this site utilizes.
Format of Field: Number - Integer
Example Entries: 1, 2, 3, etc.

Column D: **Latitude**

Description: This field is the latitude (NAD 82) of the site in decimal form to at least six significant digits.
Format of Field: Number - At least 6 decimal places
Example Entries: 61.191948, 59.191979, etc.

Column E: **Longitude**

Description: This field is the longitude (NAD 82) of the site in decimal form to at least six significant digits.
Format of Field: Number - At least 6 decimal places
Example Entries: -149.762167, -135.762141, etc.

"Site Data" Table

Column F: **Borough FIPS**

Description: This field is the five-digit FIPS code - based on 2010 designations - of the borough in which the site is located.
Format of Field: Text
Example Entries: "02020", "02068", etc.

Column G: **CMA**

Description: This field represents the standard market number of the CMA in which the site is located.
Format of Field: Number - Integer
Possible Entries: Integers 187, 315, 316, 317

Column H: **Site Type**

Description: This field indicates the type of site to which the record applies using one of the possible entries listed below.
Format of Field: Text
Possible Entries:

"Macro_Tower"	An outdoor macrocell mounted on a monopole, guyed tower, or free standing tower
"Macro_Building"	An outdoor macrocell mounted on a building
"Macro_Other"	An outdoor macrocell that does not fit the previous categories (silo, water tower, etc.)
"Microcell"	An outdoor cell classified by the vendor as a microcell
"Outdoor Pico"	An outdoor cell classified by the vendor as a picocell
"Indoor Pico"	An indoor cell classified by the vendor as a picocell
"Outdoor DAS"	An outdoor Distributed Antenna System
"Indoor DAS"	An indoor Distributed Antenna System
"Repeater"	A cell that repeats/boosts the signal of another cell
"Other"	A cell that does not meet any of the above descriptions

Column I: **Site Geographic Classification**

Description: This field indicates the morphology of the area that the site serves using one of the possible entries listed below. Please provide a description of the methodology used to determine these classifications in a separate attachment.
Format of Field: Text
Possible Entries: "Urban"
"Rural"

Column J: **Current Operator**

Description: The current operator of the site to which this data record applies. In cases where an ACS site and GCI site share the same tower or other supporting structure, each site should be entered separately.
Format of Field: Text
Possible Entries: "ACS"
"GCI"

"Site Data" Table

Column K: **Company Owned: "Y" or "N"**

Description: Is the location of the site owned by the carrier?
Format of Field: Text
Possible Entries: "Y" or "N"

Column L: **Site Structure Ownership**

Description: This field indicates whether the tower, antenna structure, or other facility on which the site is located is owned by a wireless operator (or its affiliate), or whether it is owned by an independent entity. If the structure is owned by a wireless operator or its affiliate, include the name of the wireless operator.
Format of Field: Text
Example Entries: "AT&T", "ACS", "GCI", "independent entity"

Column M: **Collocated: "Y" or "N"**

Description: Is the location of the site Co-located with other Wireless Tenants
Format of Field: Text
Possible Entries: "Y" or "N"

Column N: **# of Wireless Tenants**

Description: Provide the number of Wireless Tenants located at the site
Format of Field: Number - Integer
Example Entries: 1, 2, 3, etc.

Column O: **Total # spaces available at the Site for other wireless operators**

Description: The number of spaces available for other mobile wireless service providers
Format of Field: Number - Integer
Example Entries: 1, 2, 3, etc.

"Site Data" Table

Column P: **Expected to be Decommissioned**

Description: This field indicates if the site is currently planned for decommission.
Format of Field: Text
Possible Entries: "Y" or "N"

Column Q: **Date Decommission Decided**

Description: This field indicates the date when it was determined that a site was scheduled for decommissioning.
Format of Field: Text - YYYY_MM ("None" if not scheduled for decommissioning)
Example Entries: 2012_09

Column R: **Date of Decommission**

Description: This field indicates the date set for this site to be decommissioned.
Format of Field: Text - YYYY_MM ("None" if not scheduled for decommissioning)
Example Entries: 2013_03

Column S: **Decommission by AWN Planned**

Description: This field indicates whether or not AWN expects to decommission the site in question in the event the proposed transaction is consummated.
Format of Field: Text
Possible Entries: "Y" or "N"

Date	Site ID	Number of Sectors	Latitude	Longitude	Borough FIPS	CMA	Site Type	Site Geographic Classification	Current Operator	Company Owned: "Y" or "N"	Site Structure Ownership	Collocated: "Y" or "N"	# of Wireless Tenants

Total # spaces available at the Site for other wireless operators	Expected to be Decommissioned	Date Decommission Decided	Date of Decommission	Decommission by AWN Planned

"Backhaul" Table

The following data descriptions apply to the columns of the "Backhaul" sheet. In general, this sheet is intended to provide data on the type and amount of backhaul capacity provisioned at each GCI and ACS site. The site IDs in this table should correspond to the site IDs entered in the other requested tables. This table should contain one row for each backhaul provider at each site. Because sites can include multiple backhaul providers, the same site ID may appear in multiple rows.

Column A: **Date**

Description: The most recent date for which data is available.
Format of Field: Text - YYYY_MM

Column B: **Current Operator**

Description: The operator of the site and backhaul to which this data record applies.
Format of Field: Text
Possible Entries: "GCI"
"ACS"

Column C: **Site ID**

Description: A unique site ID for the site to which this data record applies.
Format of Field: Text
Example Entries: "AL0001", "VA0128", etc.

Column D: **Borough FIPS**

Description: This field is the five-digit FIPS code - based on 2010 designations - of the borough in which the site is located.
Format of Field: Text
Example Entries: "02020", "02068", etc.

Column E: **CMA**

Description: This field represents the standard market number of the CMA in which the site is located.
Format of Field: Number - Integer
Possible Entries: Integers 187, 315, 316, 317

Column F: **Site Geographic Classification**

Description: This field indicates the morphology of the area that the site serves using one of the possible entries listed below. Please provide a description of the methodology used to determine these classifications in a separate attachment.
Format of Field: Text
Possible Entries: "Urban"
"Rural"

"Backhaul" Table

Column G: **Backhaul Medium**

Description: The type of technology used for backhaul at this site using one of the possible entries listed below.
Format of Field: Text
Example Entries: "Fiber"
"Copper"
"Hybrid Fiber Coax (HFC)"
"Fixed Wireless"
"Satellite"

Column H: **Backhaul Provider Name**

Description: The name of the company providing backhaul services to the site.
Format of Field: Text
Example Entries: "GCI", "ACS", "AT&T", "Hatteras", etc.

Column I: **Backhaul Provider Type**

Description: The type of company providing backhaul services to the site.
Format of Field: Text
Example Entries: "ILEC", "CLEC/IXC", "Cable Provider", "Wireless", Other", etc.

Column J: **Primary Backhaul Customer**

Description: The name of the primary customer of the backhaul services provided at the site to which this data record applies. Please provide a description of the methodology used to determine the primary customer. In the event that Applicant does not own the site utilized and information regarding customers is unavailable, N/A may be written.
Format of Field: Text
Example Entries: "GCI", "ACS", "AT&T", "N/A", etc.

Column K: **Other Backhaul Customers**

Description: The names of all other customers (if any) other than the primary one of the backhaul site to which this data record applies. In the event that Applicant does not own the site utilized and information regarding customers is unavailable, N/A may be written.
Format of Field: Text - Different customers to be separated by semicolon (;)
Example Entries: "GCI", "ACS", "AT&T", "None", "N/A", etc.

"Backhaul" Table

Column L: **Backhaul Capacity Incoming_Mbps**

Description: One-way maximum capacity of backhaul link in Mbps given capabilities of existing HW - incoming to the base station

Format of Field: Number

Column M: **Backhaul Capacity Outgoing_Mbps**

Description: One-way maximum capacity of backhaul link in Mbps given capabilities of exisiting HW - outgoing from the base station

Format of Field: Number

Column N: **Capacity_Unlit (Dark)_Fiber**

Description: If fiber, capacity of unlit (dark) fiber.

Format of Field: Number

Column O: **Backhaul Cost**

Description: The weekly cost of backhaul capacity used to transport traffic between the site and the switch. If backhaul capacity is purchased for as a package for multiple sites, report the average cost for each site.

Format of Field: Number

Date	Current Operator	Site ID	Borough FIPS	CMA	Site Geographic Classification	Backhaul Medium	Backhaul Provider Name	Backahul Provider Type	Primary Backhaul Customer	Other Backhaul Customers	Backhaul Capacity Incoming_Mbps

Backhaul Capacity Outgoing_Mbps	Capacity_Unlit (Dark) Fiber	Backhaul Cost

"Backhaul Revenue" Table

The following data descriptions apply to the columns of the "Backhaul Revenue" sheet. In general, this sheet is intended to provide data on backhaul customer contracts and revenue by borough.

Column A: **Date**

Description: The half-year interval (or quarter) for which the data is being collected.
Format of Field: Text - YYYY_MM
Possible Entries: 2010_H1 2011_H1 2012_H1
2010_H2 2011_H2 2012_Q3

Column B: **Borough FIPS**

Description: This field is the five-digit FIPS code - based on 2010 designations - of the borough in which subs are located.
Format of Field: Text
Example Entries: "02020", "02068", etc.

Column C: **Borough Geographic Classification**

Description: This field indicates the morphology of the area encompassed by the borough using one of the possible entries listed below. Please provide a description of the methodology used to determine these classifications in a separate attachment.
Format of Field: Text
Possible Entries: "Urban"
"Rural"

Column D: **CMA**

Description: This field represents the standard market number of the CMA in which subs are located.
Format of Field: Number - Integer
Possible Entries: Integers 187, 315, 316, 317

"Backhaul Revenue" Table

Column E: **Customer**

Description: The name of the customer of the backhaul to which this data record applies.
Format of Field: Text
Example Entries: "AT&T", "ACS", "GCI", etc.

Column F: **Revenue**

Description: The total revenue earned from the contract to provide backhaul services from the beginning of the time period specified by Column A to the beginning of the next time period.
Format of Field: Number

Column G: **Contract Start**

Description: The start date of the contract to provide backhaul service to the leasee listed above.
Format of Field: Text - YYYY_MM

Column H: **Contract End**

Description: The expiration date of the contract to provide backhaul service to the leasee listed above.
Format of Field: Text - YYYY_MM

Date	Borough FIPS	Borough Geographic Classification	CMA	Customer	Revenue	Contract Start	Contract End

"Backhaul Costs" Table

The following data descriptions apply to the columns of the "Backhaul Costs" sheet. In general, this sheet is intended to provide data on contracts to use the backhaul of other providers and the associated costs by borough.

Column A: **Date**

Description: The half-year interval (or quarter) for which the data is being collected.
Format of Field: Text - YYYY_MM
Possible Entries: 2010_H1 2011_H1 2012_H1
2010_H2 2011_H2 2012_Q3

Column B: **Borough FIPS**

Description: This field is the five-digit FIPS code - based on 2010 designations - of the borough in which subs are located.
Format of Field: Text
Example Entries: "02020", "02068", etc.

Column C: **Borough Geographic Classification**

Description: This field indicates the morphology of the area encompassed by the borough using one of the possible entries listed below. Please provide a description of the methodology used to determine these classifications in a separate attachment.
Format of Field: Text
Possible Entries: "Urban"
"Rural"

Column D: **CMA**

Description: This field represents the standard market number of the CMA in which subs are located.
Format of Field: Number - Integer
Possible Entries: Integers 187, 315, 316, 317

"Backhaul Costs" Table

Column E: **Provider**

Description: The name of the provider of the backhaul services to which this data record applies.
Format of Field: Text
Example Entries: "AT&T", "ACS", "GCI", etc.

Column F: **Costs**

Description: The total costs from the contract to lease backhaul services from the beginning of the time period specified by Column A to the beginning of the next time period.
Format of Field: Number

Column G: **Contract Start**

Description: The start date of the contract to lease backhaul service from the provider listed above.
Format of Field: Text - YYYY_MM

Column H: **Contract End**

Description: The expiration date of the contract to lease backhaul service from the provider listed above.
Format of Field: Text - YYYY_MM

Date	Borough FIPS	Borough Geographic Classification	CMA	Provider	Costs	Contract Start	Contract End