



**Telecommunications
Law Professionals PLLC**

875 15th Street, NW, Suite 750
Washington, DC 20005
telephone 202.789.3120
facsimile 202.789.3112
www.telecomlawpros.com

REDACTED – FOR PUBLIC INSPECTION FILED/ACCEPTED

NOV 21 2012

Federal Communications Commission
Office of the Secretary

FILED/ACCEPTED

cnorthrop@telecomlawpros.com
202.789.3113

NOV 20 2012

November 21, 2012

Federal Communications Commission
Office of the Secretary

57029.00008

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

On behalf of General Communication Inc., and its subsidiaries (“GCI”), the undersigned hereby submits the enclosed Highly Confidential materials in response to the October 11, 2012 request for information and clarification in the above-referenced proceeding (the “October 11 Letter”).¹ This submission includes highly confidential narrative responses and two hard drives containing highly confidential documents responding to all requests of the October 11 Letter. Pursuant to discussions with the staff of the Wireless Telecommunications Bureau (the “Bureau”), the first hard drive includes data responsive to items 1 through 7, and 15 through 17 of the October 11 Letter and contains the entire set of documents produced to the U.S. Department of Justice (the “DOJ”) by GCI in connection with the DOJ’s review of this transaction (the “DOJ Production”).² The second hard drive contains data responsive to items 8 through 14, and 18 through 22 of the October 11 Letter. In one or more subsequent filings GCI will provide additional information for certain information requests.

In accordance with the October 11 Letter, the documents provided on the enclosed hard drives are in Summation format. The documents provided in the DOJ Production hard drive contain the original numbering system as submitted to the DOJ, which was discussed and approved by the Bureau, and the production volumes are sequentially numbered GCI001 through GCI034. The second hard drive

¹ Letter from Ruth Milkman, Chief, Wireless Telecommunications Bureau, to Cindy Lynch, GCI Communication Corp., WT Docket No. 12-187, Oct. 11, 2012.

² These materials were previously provided to the Bureau on November 2, 2012.

No. of Copies rec'd 041
List ABCDE

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch
November 21, 2012
Page 2

contains production volume FCC-GCI001, and includes documents sequentially numbered FCC-GCI0000001 through FCC-GCI0002011. The production index is also included on the hard drive.

All of the documents provided in this submission are highly confidential to GCI and therefore are being provided under seal pursuant to the Commission's Second Protective Order in this proceeding. All materials included in the enclosed hard drives are designated as "Highly Confidential" in their entirety. The hard drives are marked, "HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND PROTECTIVE ORDER IN WT DOCKET NO. 12-187 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION," according to the requirements of the Second Protective Order.

GCI has taken efforts to ensure that none of the documents submitted to the Commission or any other agency in this matter are subject to the attorney-client privilege, the work product doctrine any other applicable privilege. However, to the extent that, notwithstanding GCI's efforts, privileged or protected documents and information may have been produced, such production shall be without prejudice to our claim that any such documents and information are protected by the attorney-client privilege, any other applicable privilege, or the work product doctrine. GCI does not waive any privilege or protection by such production, and GCI does not intend to waive any applicable privilege or the protection of the work product doctrine with respect to any matter. GCI requests that any privileged or protected documents inadvertently produced be returned to GCI as soon as such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such documents.

Please feel free to contact the undersigned should you have any questions concerning this matter.

Sincerely,



Carl W. Northrop
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc: Kathy Harris, Mobility Division, Wireless Telecommunications Bureau

Enclosures [Highly Confidential]

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION