



REDACTED – FOR PUBLIC INSPECTION

cnorthrop@telecomlawpros.com
202.789.3113

December 11, 2012

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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 certain of the October 11, 2012 requests for information and clarification in the above-referenced proceeding (the “October 11 Letter”).¹ This submission includes highly confidential responses to supplement GCI’s previous productions to the Commission, which were submitted to the Commission on November 21, 2012, and November 29, 2012.² With these submissions, GCI believes it has made a good faith effort to provide the Commission with comprehensive responses to the requests in the October 11 Letter. GCI therefore respectfully requests that the Commission promptly restart the 180-day clock in the above-referenced transaction.

The highly confidential documents contained on the enclosed CD-ROM respond to Request Number 22 of the October 11 Letter, and is provided in accordance with Commission instructions in Appendix A of the October 11 Letter. The enclosed CD-ROM contains production volume FCC-GCI003, and includes documents FCC-GCI0002014 through FCC-GCI0002016. The production index is also included on the CD-ROM.

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

² Letter from Carl W. Northrop, Counsel for GCI, to Marlene Dortch, Secretary, FCC, WT Docket No. 12-187, Nov. 21, 2012; Letter from Carl W. Northrop, Counsel for GCI, to Marlene Dortch, Secretary, FCC, WT Docket No. 12-187, Nov. 29, 2012.

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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 CD-ROM are designated as "Highly Confidential" in their entirety. The CD-ROM is 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

Enclosure [Highly Confidential]