



July 15, 2013

Ex Parte

Ms. 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 Assign Licenses to The Alaska Wireless Network, LLC, WT Docket No. 12-187*

Dear Ms. Dortch:

On Thursday, July 11, 2013 I, on behalf of General Communication, Inc., spoke with Nicholas Degani, Legal Adviser to Commissioner Pai. I stated that it was unnecessary for AWN to become an ETC, and that the transaction contained specific safeguards to maintain accountability with respect to high-cost support. While AWN could, in the future, seek to be an ETC, requiring it to be an ETC would simply inject further regulatory uncertainty. In addition, these types of innovative facilities-sharing arrangements should be encouraged as ETCs of all types work to accommodate the significant changes in high-cost support made by the *USF/ICC Transformation Order*.¹

Please contact me if you have any questions.

Sincerely,

John T. Nakahata
Counsel to General Communication, Inc.

cc: Nicholas Degani

¹ *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11- 161, 26 FCC Rcd. 17,663 (2011).