

**REDACTED – FOR PUBLIC INSPECTION**

July 25, 2013

**BY HAND DELIVERY**

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

**ACCEPTED/FILED**

**JUL 25 2013**

Federal Communications Commission  
Office of the Secretary

Re: *Connect America Fund, High-Cost Universal Service Support,*  
WC Docket Nos. 10-90, 05-337

Dear Ms. Dortch:

Alaska Communications Systems (“ACS”) has proposed certain adjustments to the inputs and logic of the Connect America Cost Model (“CAM”) currently under development by the Bureau in connection with Phase II of the Connect America Fund (“CAF”). In previous meetings with ACS, the Wireline Competition Bureau staff has requested that ACS submit its CAM input collection for Solution Set 52. Herewith, ACS submits that data, all of which constitutes Highly Confidential Information under the Third Supplemental Protective Order in these proceedings.<sup>1</sup>

Specifically, the enclosed data files (in Excel spreadsheet format) comprise ACS’s CAM input collection for Solution Set 52. These inputs support ACS’s proposed changes to the CAM in four categories:

1. Changes to the plant mix inputs to reflect conditions in Alaska;
2. Changes to reflect Alaska-specific soil types;
3. Incorporation of a ten percent CapEx adjustment to reflect the higher costs of purchasing and installing broadband capital equipment and facilities as well as transporting it to and within Alaska; and
4. Reclassification of ACS as a “small” company for purposes of the CAM’s OpEx calculation.

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<sup>1</sup> *Connect America Fund; High-Cost Universal Service Support*, Third Supplemental Protective Order in WC Docket Nos. 10-90 and 05-337, DA 12-1995 (Wireline Competition Bur., rel. Dec. 11, 2012).

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Pursuant to the Third Supplemental Protective Order in the above-captioned dockets, the information contained in these Excel files is proprietary and confidential and is filed herewith under seal. In accordance with paragraph 9 of the Third Supplemental Protective Order, ACS has marked the disks with the legend, “CONFIDENTIAL INFORMATION – SUBJECT TO THIRD SUPPLEMENTAL PROTECTIVE ORDER IN WC DOCKET NO. 10-90 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.” Each individual Excel file so marked. Please find herewith one disk marked as Highly Confidential, as well as two copies addressed to Katie King in the Wireline Competition Bureau. One copy is being served on CostQuest’s counsel in accordance with paragraph 9 of the Third Supplemental Protective Order. Two copies of this cover letter marked “REDACTED – FOR PUBLIC INSPECTION” also are filed herewith. Because the entire contents of the enclosed Excel files contain Licensed Materials, they are Highly Confidential, and no redacted copies are provided. A copy of this cover letter, without the enclosed Excel files, is being filed in the dockets via ECFS.

Please direct any questions regarding this matter to me.

Very truly yours,



Karen Brinkmann  
*Counsel to ACS*

Enclosure

cc: Katie King, Wireline Competition Bureau  
Margaret Avril Lawson, Counsel to CostQuest