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November 29, 2001

Wesley E. Carson
President & Chief Administrative Officer
ACS of the Northland, Inc.
510 L Street, Suite 500
Anchorage, Alaska 99501

Re: Interconnection for Local Services - Glacier State Study Area

Dear Sir:

This correspondence will serve to request that ACS of the Northland, Inc. ("ACS-N") begin good faith negotiations towards voluntary agreement for interconnection, services and network elements necessary for GCI Communication Corp., ("GCI") to provide local telecommunications services on a facilities basis in the entire Glacier State study area, encompassing, but not limited to Delta Junction, Ft. Greely, Homer, Kenai, Kodiak, Nenana, Ninilchik, North Pole, Seldovia, and Soldotna. This letter constitutes a bona fide request for such interconnection, services and network elements under the terms of the Telecommunications Act of 1996 (the "Act"). To ascertain the final terms and network configurations, it will be necessary to negotiate wholesale prices for telecommunications services to be resold at just and reasonable prices, and for other interconnection and network elements, that are not covered under the current Interconnection Agreement between ACS-N and GCI, dated September 5, 2000, concerning interconnection, wholesale services and certain network elements in the North Pole service area. This current Interconnection Agreement can serve as a useful reference point in negotiations as to the balance of the services and elements for the rest of the study area. In order to facilitate negotiations, an initial meeting can set forth the specific information about the Glacier State facilities, i.e. lines served (with type percentages) by, equipment types at, and collocation availability in the facilities. Finally, this letter discusses necessary terms and conditions for resale interconnection and network element interconnection separately.

RESALE INTERCONNECTION TERMS

Under the Act, ACS-N must offer for resale at wholesale rates any telecommunications service that it provides at retail to subscribers who are not telecommunications carriers. Such rates should be based upon retail rates, less any portion attributable to marketing, billing, collection, overhead or other costs that will be avoided by ACS-N. GCI proposes that ACS-N provide, for resale at wholesale rates, any telecommunications service that ACS-N provides at retail to customers who are not telecommunications carriers, including not only current tariffed services, but also any promotional services offered for a period of more than 90 days, discounted services, "grandfathered" services still being provided, bundled service offerings and special contract

Wesley E. Carson, President & Chief Administrative Officer

November 29, 2001

Page 2

services. GCI will agree not to resell residential services to nonresidential end users, nor to resell Lifeline or any other means-tested service to end users not eligible to subscribe to such service offerings. Services provided for resale shall be equal in quality, subject to the same conditions, and provided within the same time intervals (i.e. provisioning, installation or repair) that ACS-N provides these services to others, including end users.

UNBUNDLED NETWORK ELEMENT INTERCONNECTION

Under the Act, ACS-N must also provide, to requesting telecommunications carriers, interconnection and access to unbundled network elements, at any technically feasible point, on rates, terms, and conditions that are just, reasonable and nondiscriminatory. This must also include appropriate outage terms (such as credits and restoral priorities) and other appropriate non-rate terms. In combination with resale, discussed above, interconnection with GCI's local facilities and access to certain ACS-N unbundled network elements can serve to allow the provisioning by GCI of competitive local telecommunications services. The points and types of interconnection and access, for which terms and pricing are requested, include the following:

Unbundled Loop and Subloop Elements

Unbundled loops include any and all elements that provide the connection, at all levels, between the end user Customer's premises and the central office main distributing frame (or its equivalent) serving the end user. Unbundled loops and subloops must be available to support Voice Grade subscriber services as well as services such as ISDN and DSL, that require that *facilities be free of intrusive devices such as load coils and Pair Gain devices and meet bridge tap requirements for the specific service.* The high frequency portion of unbundled loops and subloops, must also be available in the event that ACS-N is providing analog circuit switched voiceband services on the loop (line sharing).

1. Network Interface Device: The device used to establish connection between the end user's inside wiring and the unbundled loop element.
2. Loop: The physical facility connecting the Network Interface Device to the central office main distributing frame (or its equivalent). In cases where line concentration equipment is used, such as Digital Loop Carrier (DLC) architecture, the loop is considered to be the physical facility between the Network Interface Device and the MDF at the central office (or its equivalent, including GR-303 access where feasible). In cases where remote switching equipment is used, the loop is considered to be the physical facilities between the Network Interface Device and the remote switching facility MDF (or its equivalent).
3. Subloops: Any portion of the loop that is technically feasible to access at terminals in the outside plant, including inside wire. An accessible terminal is any point on the loop where

technicians can access the wire or fiber within the cable without removing a splice case to reach the wire or fiber therein.

Unbundled Switching Elements

Unbundled switching includes any and all elements of a central office switch and/or remote switching systems through which an end user's loop is connected to a network to create a desired communication path between the end user and another point based on signals originated by the end user.

1. **Local Switching:** The hardware (trunk-side and line-side access) and software necessary to create a desired communication path between the end user and another point based on signals originated by the end user. Local Switching includes all features, functions, and capabilities of the switch, which include, but are not limited to the basic switching function of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks, as well as the same basic capabilities made available to the ACS-N's customers, and all other features that the switch is capable of providing, including but not limited to, the provision of billing information (end user and access), custom calling, custom local area signaling service features, and Centrex, as well as any technically feasible customized routing functions provided by the switch.
2. **Local Tandem Switching:** The hardware and software necessary to connect a central office switch to another central office switch or to another point based on routing instructions received by the local tandem switch. Local Tandem Switching includes the basic switching function of connecting trunks to trunks and all other functions that are centralized in tandem switches (as distinguished from separate end-office switches), including but not limited to call recording, the routing of calls to operator services, and signaling conversion features.

Unbundled Transport Elements

Unbundled transport includes any and all physical facilities (dedicated or shared), hardware and software used to connect central office switches, local tandem switches, remote switches, and other networks in any combination required to provide a requested service. Such connection shall include connection to equipment designated by the requesting telecommunications carrier and the provision of requested services shall include the functionality provided by digital cross-connect systems and multiplexing systems in the same manner that the ACS-N provides such functionality to itself and other carriers. Transport elements can include, but are not limited to, rights-of-way, utilidors and utiliwalks, conduit systems, poles, physical strand support, microwave dishes and towers, as well as all radio, fiber and copper transport facilities. Such facilities may be "dark" or may include any electronics employed, whether microwave, copper or fiber based, and employing any multiplexing scheme or transmission protocol.

Collocation

GCI requests a discussion as to physical collocation of GCI equipment necessary for interconnection or access to unbundled network elements at existing wire centers. GCI requests discussion as to virtual or adjacent collocation to any remaining ACS-N wire centers for interconnection and access to unbundled elements, where physical collocation is not, for any reason, negotiated.

1. **Physical Collocation:** Physical collocation enables GCI to place, within or upon ACS-N's premises or points, equipment necessary, required or indispensable for interconnection to ACS-N's network facilities for the transmission and routing of telephone exchange service, exchange access service, or both, and for access to ACS-N's unbundled network elements. The collocation space will be enclosed by walls or chain link fence. Physical collocation includes floor space, power, heating, air conditioning, climate control, fire control, lighting, security, and safe, secure access to the collocation space. No restrictions may be placed on the type or manufacturer of equipment or facilities used so long as the equipment or facilities comply with FCC Rules and Regulations regarding the manufacture of equipment and generally accepted industry standards. GCI will not install any equipment used solely for switching or solely for providing enhanced services.
2. **Virtual Collocation:** Virtual collocation enables GCI to designate specific equipment, dedicated to GCI's use, to be installed, maintained, and repaired by ACS-N within or upon ACS-N's premises in space selected by ACS-N. The equipment designated by GCI is necessary, required or indispensable for interconnection to ACS-N's network facilities for the transmission and routing of telephone exchange service, exchange access service, or both, and for access to ACS-N's unbundled network elements. No restrictions may be placed on the type or manufacturer of equipment or facilities used in such interconnection so long as the equipment or facilities comply with FCC Rules and Regulations regarding the manufacture of equipment and generally accepted industry standards. GCI will not install any equipment used solely for switching or solely for providing enhanced services.
3. **Adjacent Collocation:** Adjacent collocation enables GCI, where space is legitimately exhausted in particular ACS-N premises, to collocate in controlled environmental vaults, controlled environmental enclosures or similar structures located on, or near, ACS-N property to the extent technically feasible. The equipment installed by GCI at adjacent collocation sites will be necessary, required or indispensable for interconnection to ACS-N's network facilities for the transmission and routing of telephone exchange service, exchange access service, or both, and for access to ACS-N's unbundled network elements. No restrictions may be placed on the type or manufacturer of equipment or facilities used in such interconnection so long as the equipment or facilities comply with FCC Rules and Regulations regarding the manufacture of equipment and generally accepted industry

standards. GCI will not install any equipment used solely for switching or solely for providing enhanced services.

Unbundled Directory Assistance and Directory Listings

Unbundled directory assistance includes the necessary hardware, software, information and databases to perform directory services, including the publication of directories.

1. **Directory Platforms:** The hardware and software capabilities used to provide directory services. Access to the platform (if any) will be provided in such a way so as to allow remote directory stations to be connected to the platform.
2. **Directory Listings and Databases:** The directory listings, as well as access to databases with information on individual telephone numbers, including the name, address, zip code, city (or other location identifier) and the ability to search for telephone numbers based on a name, address, or other location identifier.

Unbundled Operations Support Systems

Unbundled operations support systems are each of the systems, including the necessary hardware, software and databases, used in the ordering, provisioning, maintenance, testing, billing, and updating of network databases. As discussed below under quality of services, access to each of the operations support systems shall be provided through the use of an electronic interface where possible. Each operations support system must provide timely information the same as—the information ACS-N provides to itself. In all cases, ACS-N should discuss with GCI the steps necessary to provide electronic access to databases and capabilities.

1. **Ordering and Provisioning:** The systems, databases, and procedures in which the LEC establishes a request for service, including all features and functions, assigns telephone numbers, schedules a date and time for installation (if access to a location is required or if a service call is required to activate service). This includes but is not limited to input to and appropriate retrieval of data from the service order input system, plant assignment records and the service order dispatch system. Input capabilities must be provided into other databases that establish directory listings, populate LIDB, and update directory services databases upon provisioning of the end user's service. Input into databases to activate features and functions ordered by the end user must also be provided to fully implement the end user's service request.
2. **Billing:** The information recorded by the central office, adjunct processor, or centralized recording devices relating to calls from or to an end user's loop. Billing information shall be furnished on request and shall include all information necessary to bill the end user for

calls it is required to pay for and verify all information necessary to verify charges for services that GCI is required to pay for. ACS-N will provide for the retrieval of data from the database in which ACS-N stores customer information used to generate a bill to the end user based on the service and features and functions ordered by the end user. Billing information used to generate a bill for or to GCI would include, but not be limited to, data in the appropriate Automatic Message Accounting (AMA) records and the Carrier Access Billing System (CABS) databases.

3. Maintenance: The systems, databases, and procedures in which ACS-N generates customer reported troubles, schedules appointments for work at end user premises, and schedules repair actions. Where trouble tickets are still tracked manually, access to those records regarding GCI end users should also be provided. Access to appropriate data from databases which monitor and report on the integrity of the ACS-N network and can be used to inform end users of network problems impacting the end user's ability to complete calls to specific locations. Access to maintenance databases would include, but not be limited to, access to the trouble dispatch system and any network monitoring and trouble tracking systems. Where trouble tickets are still tracked manually, access to those records must also be provided.
4. Testing: The systems used by the LEC to isolate troubles and direct repair operations. The systems used by the LEC to routinely test individual parts of the network (loops, switches, transmission, and other functional parts of the network) and report on the performance of these individual parts. This section should be interpreted to require access to the systems, databases, and procedures listed above under maintenance. Line and trunk testing for GCI facilities shall be furnished on request, along with testing for any module or bay housing GCI lines and trunks.
5. Quality of service: Access to each of the operations support systems shall be provided through the use of electronic interfaces, or if such interfaces are not utilized by ACS-N, then-the-best-means practically available. Each operations support system must provide timely information, the same as or better than the information ACS-N provides to itself. In all cases, ACS-N should discuss with GCI, as soon as possible, the steps necessary to provide access to electronic databases on a dedicated port basis, facilitating remote (off-site) access to said databases. Support services provided relating to resale shall be equal in quality, subject to the same conditions, and provided within the same provisioning time intervals that ACS-N provides these services to others, including end users. Support services provided relating to unbundled network elements (i.e. assignment, installation or repair) shall be equal in quality, subject to the same conditions, and provided within the same provisioning time intervals that ACS-N provides these services to itself or others, including end users.

ACS-N should furnish to GCI comparative quality of service and network performance data, reporting ACS-N vs. CLEC performance (average installation time, average outages, etc.) the same as or better than the information data that ACS-N provides to itself.

NOTICE OF CHANGES

Whether competitive local services are provided by resale of telecommunications services or through the use of facilities (interconnected and/or unbundled), the Act requires ACS-N to provide reasonable notice to GCI of changes in the information necessary for the provision of such services, as well as any of any other changes that would affect the interoperability of our respective facilities and networks. GCI would propose that ACS-N provide GCI with notice regarding any network change that will affect GCI's performance or ability to provide service or will affect ACS-N's interoperability with other service providers. Such notice shall be given to the public, including GCI, pursuant to the Regulations contained at 47 C.F.R. 51.325-335, and to GCI individually at regularly scheduled meetings between designated engineering representatives of the parties. GCI also specifically requests pricing of any, and all systems training materials and support necessary to implement any such changes as part of such notice.

NUMBER PORTABILITY/DIALING PARITY

Under the Act, ACS-N must provide number portability to subscribers and dialing parity to competing providers of local telecommunications services. GCI anticipates that ACS-N's current capabilities can accommodate retention of existing numbers by current ACS-N customers migrating to GCI, upon entry by GCI into local competition in new ACS-N service areas, as well as the provision of dialing parity. In the event that these cannot be provided with existing software, GCI would propose that number portability and dialing parity be instituted on an interim basis.

RIGHTS-OF-WAY

In addition to the collocation described above, ACS-N shall provide GCI with nondiscriminatory access to any pole, duct, conduit systems, utilidor/walk or rights-of-way (including fee property for adjacent collocation) owned or controlled by it. Non-discriminatory access shall include any use to which ACS-N puts such facilities or property, including the placement of equipment, including remote terminals, on property owned or controlled by ACS-N. In order to facilitate negotiations and finalize facilities plans, it is necessary that GCI be provided adequate information regarding the placement and fill as to these facilities, especially as they relate to the interconnection and access points identified during negotiations.

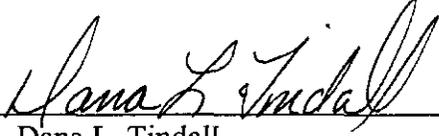
Wesley E. Carson, President & Chief Administrative Officer
November 29, 2001
Page 8

RECIPROCAL COMPENSATION

Finally, ACS-N and GCI must negotiate and establish reciprocal compensation arrangements for the transport and termination of telecommunication traffic between the networks. This reciprocal compensation arrangement must be just and reasonable, GCI would propose that this reciprocal recovery be initially provided by a "bill-and-keep" arrangement as to any facilities affected, as is utilized in the current Interconnection Agreement between the parties.

Pursuant to the Act, a copy of this request is being furnished to the Regulatory Commission of Alaska. We look forward to your timely response to this request and the start of negotiations.

GCI COMMUNICATION CORP.

By: 
Dana L. Tindall
Its: Senior Vice President Regulatory Affairs

cc: Regulatory Commission of Alaska
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Anchorage, Alaska 99501