

January 14, 2021

Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 20554

RE: Notice of *Pro Forma* Assignment from ACS Long Distance, Inc. (ITC-214-19960612-00248; *see also* ITC-T/C-20050822-00382; ITC-T/C-20040414-00190) to ACS Long Distance, LLC

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 63.24(d) and (f), ACS Long Distance, LLC (“ACS-LD LLC”) hereby files notice of the *pro forma* assignment of the above-referenced international section 214 authorization (the “Authorization”) held by ACS Long Distance, Inc. (“ACS-LD INC”) to ACS-LD LLC, which occurred on January 1, 2013.<sup>1</sup> This letter serves as notice of *pro forma* assignment of the Authorization.<sup>2</sup> Pursuant to applicable state law ACS-LD INC was converted into ACS-LD LLC and ACS-LD LLC is treated as the same entity as ACS-LD INC.

As set forth in the Commission’s regulations at 47 C.F.R. § 63.24(d), this assignment is presumptively classified as *pro forma* because it is an “[c]orporate reorganization that involves no substantial change in the beneficial ownership of the corporation (including ... change in form of the business entity).”<sup>3</sup> This assignment is the result of a corporate reorganization that involves no substantial change in the beneficial ownership of the corporation. The assignment has resulted from a change in organizational form of the business entity holding the Authorization from a corporation to a limited liability company.

In compliance with the Commission’s regulations at 47 C.F.R. § 63.24(f)(2), ACS-LD INC and ACS-LD LLC hereby provide the following information:

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<sup>1</sup> ACS-LD LLC previously sent notice of this *pro forma* transaction to the Commission on January 31, 2013, within the 30-day period provided under the Commission’s rules, *see* 47 C.F.R. § 63.24(f)(2). That filing was evidently lost and does not appear in the Commission’s records today. ACS-LD LLC has therefore updated the original notice and is hereby re-filing it to ensure that the Commission’s records are accurate and complete with respect to this transaction.

<sup>2</sup> Pursuant to the Commission’s rules, ACS-LD INC is not required to notify the Commission of the concurrent transfer of ACS-LD INC’s domestic section 214 authorization. *See* 47 C.F.R. § 63.03(d)(1); *see also Implementation of Further Streamlining Measures of Domestic Section 214 Authorizations*, Report and Order 17 FCC Rcd 5517, ¶ 54 (2002).

<sup>3</sup> 47 C.F.R. § 63.24(d), Note 2.

1. Name, address, and telephone number of the assignee:

Assignee: ACS Long Distance, LLC  
600 Telephone Avenue, MS #60  
Anchorage, Alaska 99503  
(907) 297-3000

2. The Government, State, or Territory under which assignee is organized:

ACS Long Distance, LLC is organized under the laws of the State of Alaska.

3. The name, title, address, and telephone number of the officer and other contact (including legal counsel) to whom correspondence concerning this notice should be addressed:

Leonard Steinberg  
General Counsel  
Alaska Communications Systems Group, Inc.  
600 Telephone Avenue, MS #60  
Anchorage, Alaska 99503  
(907) 297-3000

Lisa Phillips  
Manager, Regulatory Affairs  
Alaska Communications Systems Group, Inc.  
600 Telephone Avenue, MS #60  
Anchorage, Alaska 99503  
(907) 297-3000

Karen Brinkmann  
KAREN BRINKMANN PLLC  
1800 M Street, NW  
Suite 800-N  
Washington, D.C. 20036  
(202) 365-0325

4. A statement as to whether assignee has previously received authority under section 214 and, if so, a general description of the categories of facilities and services authorized:

ACS Long Distance, LLC has not previously received domestic or international authority under section 214, but the assignor ACS Long Distance, Inc. has previously received both domestic and international 214 authorizations, pursuant to 47 C.F.R. § 63.01 and § 63.18, to provide domestic and international switched, private line, data, and business services to all interstate and international points.

5. The name, address, citizenship, and principal business of any person or entity that directly or indirectly owns at least ten percent of the equity in assignee:

ACS of Alaska, LLC owns 100% equity in the assignee, ACS Long Distance, LLC

ACS of Alaska, LLC  
600 Telephone Avenue, MS #60  
Anchorage, Alaska 99503  
(907) 297-3000

ACS of Alaska, LLC is a limited liability company organized under the laws of the State of Alaska.

In turn, Alaska Communications Systems Holdings, Inc. owns 100% equity in ACS Alaska, LLC.

Alaska Communications Systems Holdings, Inc.  
600 Telephone Avenue, MS #60  
Anchorage, Alaska 99503  
(907) 297-3000

Alaska Communications Systems Holdings, Inc. is a corporation organized under the laws of the State of Delaware.

In turn Alaska Communications Systems Group, Inc. holds owns 100% equity in Alaska Communications Systems Holdings, Inc.

Alaska Communications Systems Group, Inc.  
600 Telephone Avenue, MS #60  
Anchorage, Alaska 99503  
(907) 297-3000

Alaska Communications Systems Group, Inc. is a corporation organized under the laws of the State of Delaware.

Alaska Communications Systems Group, Inc. is a publicly traded corporation under the symbol “ALSK” on the Nasdaq exchange. No individual or entity owns a ten percent or greater equity interest in Alaska Communications Systems Group, Inc.

As the Commission has recognized, an assignment accomplished through a “[c]orporate reorganization that involves no substantial change in the beneficial ownership of the corporation (including ... change in form of the business entity)” is presumptively classified as a *pro forma* transaction because it does “not result in a change in the actual controlling party [and] are

considered non-substantial.”<sup>4</sup> This case involves an assignment resulting from a corporate reorganization, in which the business entity holding the Authorization underwent a change in organizational form from a corporation to a limited liability company. The reorganization involved no substantial change in the beneficial ownership of the business entity holding the Authorization. Therefore, in accordance with 47 C.F.R. § 63.24(f)(2)(ii), ACS Long Distance, LLC hereby certifies that the assignment from ACS Long Distance, Inc. to ACS Long Distance, LLC was *pro forma* and, together with all previous *pro forma* transactions, did not result in a change in the actual controlling party of the business entity holding the Authorization.

I, Lars Danner, Deputy General Counsel, Alaska Communications Systems Group, Inc., in accordance with Section 1.16 of the Commission’s rules, 47 C.F.R. § 1.16, hereby certify under penalty of perjury that the foregoing statements are true and correct, to the best of my information, knowledge, and belief.

Respectfully submitted,

ACS Long Distance, LLC



Lars Danner  
Deputy General Counsel  
Alaska Communications Systems Group, Inc.

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<sup>4</sup> 47 C.F.R. § 63.24(d) and Note 2.