

**ATTACHMENT 1
FOR THE *PRO FORMA* TRANSFER OF CONTROL OF
INTERNATIONAL SECTION 214 AUTHORIZATION**

This filing notifies the Commission pursuant to Section 63.24(f) of the Commission's rules, 47 C.F.R. §63.24(f), of the *pro forma* transfer of control of the international Section 214 authorization held by The Alaska Wireless Network, LLC ("AWN") from ACS Wireless, Inc., through its wholly-owned subsidiary, ACS of Anchorage License Sub, LLC ("ACS" or "Transferor") to GCI Communication Corp. ("GCICC" or "Transferee"), through its wholly-owned subsidiary, GCI Wireless Holdings, LLC, which occurred on February 2, 2015.

Answer to Question 10 – Section 63.18(c)-(d):

Contact Information for Transferor and Transferee pursuant to §63.18(c)

Transferor: Questions concerning ACS should be directed to:
Leonard Steinberg, General Counsel
ACS Wireless, Inc.
600 Telephone Avenue
Anchorage, Alaska 99503
(907) 297-3105
leonard.steinberg@acsalaska.com

with a copy to:
Gabriel Saltarelli
Sidley Austin LLP
787 Seventh Avenue
New York, NY 10019
(212) 839-5918
gsaltarelli@sidley.com

Transferee: Questions concerning GCICC should be directed to:
Tina M. Pidgeon
SVP, Government Affairs & General Counsel
GCI Communication Corp.
2550 Denali Street, Suite 1000
Anchorage, Alaska 99503
(907) 868-5312
tpidgeon@gci.com

with a copy to:
John T. Nakahata
Harris, Wiltshire & Grannis LLP
1919 M Street, NW, Eighth Floor
Washington, DC 20036
(202) 730-1320
jnakahata@hwglaw.com

International Section 214 Authorization, pursuant to §63.18(d)

AWN has authority under Section 214 of the Act to provide international global resale service, pursuant to FCC file no. ITC-214-20120618-00162.

GCICC is authorized to provide international global resale service, pursuant to FCC file no. ITC-214-19960116-00009.

Answer to Question 11 – Section 63.18(h):

Name, address, citizenship, and principal business of each of GCICC’s ten percent or greater interest holders:

The following persons and entities directly or indirectly own at least ten percent of the equity of Transferee, GCI Communication Corp.

The Applicant, GCI Communication Corp., an Alaska corporation, is a wholly-owned indirect subsidiary of its ultimate parent corporation and real party in interest, General Communication, Inc., an Alaska corporation that is widely held and publicly traded (NASDAQ: GNCMA).

General Communication, Inc., directly owns 100% of GCI, Inc., an Alaska corporation, which directly owns 100% of GCI Holdings, Inc, an Alaska corporation, which directly owns 100% of the Applicant, GCI Communication Corp.

No other entity, directly or indirectly, owns at least ten percent of the equity of the Transferee, GCI Communication Corp.

Answer to Question 13 – Means by which the proposed transfer of control:

Pursuant to the terms of a Purchase and Sale Agreement executed on December 4, 2014 (the “Transaction”), GCI Communication Corp. (“GCICC”) acquired, subject to certain limitations and exclusions, all of the ACS Wireless, Inc. (“ACS”) interests in The Alaska Wireless Network, LLC (“AWN”). Prior to consummation of the Transaction, AWN was a jointly-owned subsidiary in which GCICC held a 66 2/3 percent indirect controlling interest, through a wholly-

owned subsidiary, GCI Wireless Holdings, LLC. ACS held the remaining 33 1/3 percent. Although GCICC had control over AWN, ACS was nevertheless able to maintain a certain level of control over AWN because of certain protections in the AWN Joint Operating Agreement, which required unanimous board approval for certain actions. *See 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, Memorandum Opinion and Order and Declaratory Ruling, FCC 13-96, 28 FCC Rcd. 10,433, 10,438, ¶ 14 (2013).* Upon consummation of the Transaction, GCICC now has 100 percent indirect control over AWN. The subject transfer is *pro forma* because it does not involve a substantial change in ownership or control.

Control of ACS' 33 1/3 percent of AWN's international Section 214 authority (FCC file no. ITC-214-20120618-00162) transferred to GCI as part of this transaction.

Assignor ACS will continue to operate under all of its international Section 214 authorization, pursuant to FCC file no. ITC-214-19960612-00248 (subsequent transfers in FCC file nos. ITC-T/C-19981214-00915; ITC-T/C-20040414-00190; ITC-T/C-20050822-00382).