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ATTORNEYS AT LAW

19 October 2012

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Pro Forma Assignment of Cable Landing License for the Alaska United West System, FCC File No. SCL-LIC-20020522-00047

Dear Ms. Dortch:

By its counsel, Unicom, Inc. (“Unicom”), hereby notifies the Commission of a *pro forma* assignment of the above-referenced cable landing license. Consistent with Section 1.767(g)(7) and the *pro forma* condition in the cable landing license for the Alaska United West undersea cable system, Unicom is notifying the Commission of this *pro forma* assignment within 30 days of the consummation date of the assignment.¹

On September 29, 2012, as part of an internal corporate reorganization, GCI Communication Corp. (“GCIC”) assigned the cable landing license for the Alaska United West system to Unicom. GCIC and Unicom are both wholly-owned and controlled subsidiaries of General Communication, Inc. (“GCI”). Unicom therefore certifies in the attachment to this letter that the assignment is *pro forma* as defined by Section 63.24(a) of the Commission’s rules and, taken together with all previous *pro forma* transactions, would not result in a change of the licensee’s ultimate control. GCI will retain ultimate control of the cable landing license after the consummation of the assignment. As indicated in the attached certificate of service, the Executive Branch agencies have been notified of the *pro forma* assignment.

In preparing this *pro forma* assignment notification, Unicom and GCIC discovered that the Commission had never noted in the International Bureau Filing System (“IBFS”) an earlier *pro forma* assignment of the Alaska United West cable landing license, from the Alaska United

¹ See 47 C.F.R. § 1.767(g)(7); *Actions Taken Under the Cable Landing License Act*, Public Notice, 2002 FCC LEXIS 3809 (2002) (adding *pro forma* condition as Routine Condition 7).

WILTSHIRE & GRANNIS LLP

Ms. Marlene H. Dortch
Federal Communications Commission
19 October 2012
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Fiber System Partnership (“AUFSP”) to GCIC. AUFSP and GCIC notified the Commission of that earlier *pro forma* assignment on May 15, 2008, as reflected in the attached copy of that earlier notification, date-stamped by the Secretary’s office. Unicom and GCIC respectfully request that the Commission note the earlier filing in its licensing files and IBFS.

Unicom also requests that the Commission note in its licensing files and IBFS the following contact information:

Licensee:

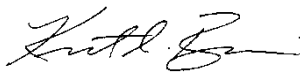
UNICOM, INC.
2550 Denali Street
Suite 1000
Anchorage, Alaska 99503

Contact:

Kent D. Bressie
WILTSHIRE & GRANNIS LLP
1200 18th Street, N.W.
Suite 1200
Washington D.C. 20036
+1 202 730 1337
kbressie@wiltshiregrannis.com

Should you have any questions regarding this letter or require additional information, please contact me by telephone at +1 202 730 1337 or by e-mail at kbressie@wiltshiregrannis.com.

Respectfully submitted,



Kent D. Bressie
*Counsel for Unicom, Inc. and
GCI Communication Corp.*

Attachment

cc: David Krech (IB)
George Li (IB)

ATTACHMENT:

**2008 NOTIFICATION OF PRO FORMA ASSIGNMENT OF CABLE LANDING
LICENSE FOR THE ALASKA UNITED WEST SYSTEM**

STAMP AND RETURN

1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.HARRISWILTSHIRE.COM

ATTORNEYS AT LAW

15 May 2008

BY HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

FILED/ACCEPTED

MAY 15 2008

Federal Communications Commission
Office of the Secretary

Re: Pro Forma Assignment of Cable Landing License for the Alaska United West System, FCC File No. SCL-LIC-20020522-00047

Dear Ms. Dortch:

By its counsel, GCI Communication Corp. ("GCIC") hereby notifies the Commission of a *pro forma* assignment of the above-referenced cable landing license. Consistent with Section 1.767(g)(7) and the *pro forma* condition in AUFSP's cable landing license for the Alaska United West system, GCIC is notifying the Commission of this *pro forma* assignment within 30 days of the consummation date of the assignment.¹

On May 15, 2008, Alaska United Fiber System Partnership ("AUFSP") assigned the cable landing license for the Alaska United West undersea cable system to GCIC. AUFSP and GCIC are both wholly-owned and controlled subsidiaries of General Communication, Inc. ("GCI"). GCIC therefore certifies in the attachment to this letter that the assignment is *pro forma* as defined by Section 63.24(a) of the Commission's rules and, taken together with all previous *pro forma* transactions, would not result in a change of the licensee's ultimate control. GCI will retain ultimate control of the cable landing license both before and after the consummation of the assignment. As indicated in the attached certificate of service, the Executive Branch agencies have been notified of the *pro forma* assignment

¹ See 47 C.F.R. § 1.767(g)(7); *Actions Taken Under the Cable Landing License Act, Public Notice*, 2002 FCC LEXIS 3809 (2002) (adding *pro forma* condition as Routine Condition 7).

Ms. Marlene H. Dortch
Federal Communications Commission
15 May 2008
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With respect to FCC File No. SCL-LIC-20020522-00047, GCIC respectfully requests that the Commission note in its licensing files and IBFS the following information:

Licensee:

GCI COMMUNICATION CORP.
2550 Denali Street
Suite 1000
Anchorage, Alaska 99503

Contact:

Kent D. Bressie
HARRIS, WILTSHIRE & GRANNIS LLP
1200 18th Street, N.W.
Suite 1200
Washington D.C. 20036
+1 202 730 1337
kbressie@harriswiltshire.com

Should you have any questions regarding this letter or require additional information, please contact me by telephone or email using the contact information provided above.

Respectfully submitted,



Kent D. Bressie
*Counsel for GCI Communication Corp. and
Alaska United Fiber System Partnership*

cc: Jim Ball (IB)
Cathy Hsu (IB)
David Krech (IB)

CERTIFICATE OF SERVICE

I, Kent D. Bressie, hereby certify that consistent with Section 1.767(j) of the Commission's rules, 47 C.F.R. § 1.767(j), I have served by hand- or overnight delivery copies of the foregoing post-consummation notice of *pro forma* assignment of the cable landing license for the Alaska United West undersea cable system on this 15th day of May 2008, to the following:

Ambassador David Gross
U.S. Coordinator
Int'l Communications & Information Policy
Bureau of Economic and Business Affairs
U.S. DEPARTMENT OF STATE
EB/CIP : Room 4826
2201 C Street, N.W.
Washington, D.C. 20520-5818

Kathy Smith
Chief Counsel
U.S. DEPARTMENT OF COMMERCE/NTIA
14th Street and Constitution Avenue, N.W.
Room 4713
Washington, D.C. 20230

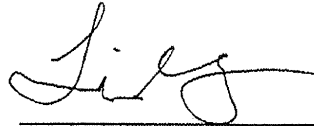
Hillary Morgan
Deputy General Counsel, Regulatory &
International Law
Code RGC
DEFENSE INFORMATION SYSTEMS AGENCY
701 South Courthouse Road
Arlington, Virginia 22204



Kent D. Bressie

CERTIFICATION

I, Tina Pidgeon, Vice President – Federal Regulatory Affairs of GCI Communication Corp. (“GCIC”) hereby certify that the assignment described in the attached letter was *pro forma* as defined by Section 63.24 of the Commission’s rules, and that, taken together with all previous *pro forma* transactions, did not result in a change of the licensee’s ultimate control. To the contrary, General Communication, Inc. (“GCI”), will retain ultimate control of the cable landing license both before and after the consummation of the assignment, as both the assignor (Alaska United Fiber System Partnership) and the assignee (GCIC) are wholly-owned and controlled by GCI.



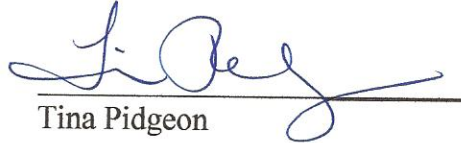
Tina Pidgeon
Vice President – Federal Regulatory Affairs
GCI COMMUNICATION CORP.
1130 17th Street, N.W., Suite 312
Washington, D.C. 20036
+1 202 457 8812 tel

15 May 2008

CERTIFICATION

I, Tina Pidgeon, a Director of Unicom, Inc., hereby certify to the following:

- (1) All of the information contained in the attached notification letter is true and accurate to the best of my knowledge;
- (2) The assignment effected by the internal corporate reorganization of General Communication, Inc. ("GCI"), and its operating subsidiaries was *pro forma*, as defined in 47 C.F.R. § 63.24, and that taken together with all the previous *pro forma* transactions, did not result in a change of in ultimate control of the cable landing license for the Alaska United West system; and
- (3) No party to this notification is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.



Tina Pidgeon

UNICOM, INC.
2550 Denali Street
Suite 1000
Anchorage, Alaska 99503
+1 907 868 5600 tel

19 October 2012

CERTIFICATE OF SERVICE

I, Kent D. Bressie, hereby certify that consistent with Section 1.767(j) of the Commission's rules, 47 C.F.R. § 1.767(j), I have served by e-mail and hand delivery copies of the foregoing post-consummation notice of *pro forma* assignment of the cable landing license for the Alaska United West undersea cable system on this 19th day of October 2012, to the following:

Ambassador Philip Verveer
U.S. Coordinator
Int'l Communications & Information Policy
Bureau of Economic and Business Affairs
U.S. DEPARTMENT OF STATE
EB/CIP : Room 4826
2201 C Street, N.W.
Washington, D.C. 20520-5818

Kathy Smith
Chief Counsel
U.S. DEPARTMENT OF COMMERCE/NTIA
14th Street and Constitution Avenue, N.W.
Room 4713
Washington, D.C. 20230

Hillary Morgan
Deputy General Counsel, Regulatory &
International Law
Code RGC
DEFENSE INFORMATION SYSTEMS AGENCY
701 South Courthouse Road
Arlington, Virginia 22204

A handwritten signature in black ink, appearing to read "Kent D. Bressie", written over a horizontal line.

Kent D. Bressie