

January 14, 2021

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

RE: Notice of *Pro Forma* Assignment from ACS Cable Systems, Inc. (FCC File No. SCL-LIC-20071025-00018) to ACS Cable Systems, LLC

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.767(g)(7) and § 63.24(d) and (f), ACS Cable Systems, LLC (“ACS Cable LLC”) hereby files notice of the *pro forma* assignment of the above-referenced cable landing license (the “License”) held by ACS Cable Systems, Inc. (“ACS Cable INC”) to ACS Cable LLC, which occurred on January 1, 2013.¹ This letter serves as notice of *pro forma* assignment of the License. Pursuant to applicable state law, ACS Cable INC was converted into ACS Cable LLC and ACS Cable LLC is treated as the same entity as ACS Cable 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).”² 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 License from a corporation to a limited liability company.

In compliance with the Commission’s regulations at 47 C.F.R. §§ 1.767(g)(7) and 63.24(f)(2), ACS Cable INC and ACS Cable LLC hereby provide the following information:

¹ ACS Cable 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. § 1.767(g)(7). That filing was evidently lost and does not appear in the Commission’s records today. ACS Cable 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.

² 47 C.F.R. § 63.24(d), Note 2.

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

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

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

ACS Cable Systems, LLC is organized under the laws of the State of Delaware.

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 Cable Systems, LLC has not previously received a cable landing license, but the assignor ACS Cable Systems, Inc. has previously received a cable landing license (FCC File No. SCL-LIC-20071025-00018).

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:

Alaska Communications Systems Holdings, Inc. owns 100% equity in ACS Cable Systems, 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.”³ This case involves an assignment resulting from a corporate reorganization, in which the business entity holding the License 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 License. Therefore, in accordance with 47 C.F.R. §§ 1.767(g)(7) and 63.24(d) and (f)(2)(ii), ACS Cable LLC hereby certifies that the assignment from ACS Cable INC to ACS Cable 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 License.

³ 47 C.F.R. § 63.24 (d) and Note 2.

I, Lars Danner, Assistant Corporate Secretary, 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 Cable Systems, LLC

A handwritten signature in blue ink that reads "Lars Danner". The signature is written in a cursive, flowing style.

Lars Danner
Assistant Corporate Secretary
Alaska Communications Systems Group, Inc.