

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of

GCI COMMUNICATION CORP.

Application to Modify the Wrangell, Alaska,
Landing Point, for

THE ALASKA UNITED SOUTHEAST SYSTEM

File No. SCL-LIC-20071023-00019
SCL-MOD-2020-_____

**APPLICATION TO MODIFY CABLE LANDING LICENSE—
STREAMLINED PROCESSING REQUESTED**

GCI Communication Corp. (“GCICC,” FRN 0001568880) hereby applies for authority to relocate the geographic landing point in Wrangell, Alaska, for Segment 1 of the Alaska United Southeast (“AU-SE”) submarine cable system, previously known as the SEAK and SEAFEST system. GCICC requests streamlined processing for this application pursuant to 47 C.F.R. § 1.767(k)(1), as the AU-SE system is a domestic submarine cable system that does not implicate foreign affiliations for any landing point, and 47 C.F.R. § 1.767(k)(4), as Alaska does not require a consistency certification under the Coastal Zone Management Act with respect to a cable landing license.

The AU-SE system connects the Alaska communities of Angoon, Hawk Inlet, Juneau, Ketchikan, Petersburg, Sitka, and Wrangell with the existing Alaska United West System (which is owned by GCICC’s affiliate, Alaska United Fiber System Partnership) and operates on a non-common-carrier basis. The Commission granted a cable landing license for the AU-SE system

effective December 6, 2007,¹ and the AU-SE system entered commercial service on October 15, 2008.

Segment 1 of the AU-SE system connects Wrangell with Ketchikan. In Wrangell, Segment 1 shares a landing with Segment 2 of the AU-SE system, which connects Wrangell to Mitkof Island (also known as the Petersburg South landing). To enhance the geographic diversity of AU-SE landings and resilience of the AU-SE system, GCICC seeks to move the Segment 1 landing to a new geographic landing point south of its existing location. This relocation of the Segment 1 landing will entail the construction of a new beach manhole but will not alter the location of the existing cable landing station. This relocation will not have any impact on the landing of Segment 2 of the AU-SE system at the existing landing in Wrangell. GCICC seeks to commence relocation of the Segment 1 landing no later than September 8, 2020.

In part I of this application, GCICC provides the information required by 47 C.F.R. § 1.767. In part II, GCICC requests streamlined processing for this application.

I. COMPLIANCE WITH 47 C.F.R. § 1.767

In accordance with 47 C.F.R. § 1.767 and Executive Order No. 10,530, GCICC submits the following information:

(1) Applicant's Name, Address, and Telephone Number²

GCICC's name, address, and telephone number are as follows:

GCI COMMUNICATION CORP.
2550 Denali Street
Suite 1000
Anchorage, Alaska 99503
+1 907 265 5600

¹ *Actions Taken Under Cable Landing License Act*, Public Notice, 22 FCC Rcd. 21,422 (Int'l Bur. 2007) (“AU-SE Cable Landing License”).

² See 47 C.F.R. § 1.767(a)(1).

(2) Applicant's Places of Incorporation³

GCICC is an Alaska corporation.

(3) Contact Information for Applicant⁴

The Commission should address correspondence regarding this application to:

Tim Stelzig
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and

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Counsel for GCI Communication Corp.

(4) System Description⁵

The AU-SE system description has not changed from the description submitted as part of the original cable landing license application.⁶

³ *See id.* § 1.767(a)(2).

⁴ *See id.* § 1.767(a)(3).

⁵ *See id.* § 1.767(a)(4).

⁶ *See Application for a License to Land and Operate the Southeast Alaska Fiber-Optic System, FCC File No. SCL-LIC-20071023-00019, at 3-4 (filed Oct. 23, 2007) (“AU-SE Application”).*

(5) Landing Points⁷

The landing points for the AU-SE system have not changed from the geographic details filed as part of the original cable landing license application.⁸.

(6) Regulatory Status⁹

GCICC will continue to operate the AU-SE system on a non-common-carrier basis following the relocation of the Segment 1 landing in Wrangell. The underlying facts supporting the non-common-carrier status of the AU-SE system have not changed since the Commission first licensed AU-SE in 2007.¹⁰

(7) Cable Ownership Information¹¹

GCICC continues to own all of the AU-SE system, including Segment 1 (the subject of this license modification application) and the associated cable landing station in Wrangell.¹²

(8) Corporate Control and Affiliate Information¹³

GCICC submits the following information specified in 47 C.F.R. § 63.18(h) through (k) and 63.18(o):

⁷ See 47 C.F.R. § 1.767(a)(5).

⁸ See AU-SE Application at 5-6 and Exhibit B.

⁹ See 47 C.F.R. § 1.767(a)(6).

¹⁰ See AU-SE Application at 7-9.

¹¹ See 47 C.F.R. § 1.767(a)(7).

¹² See AU-SE Application at 9.

¹³ See 47 C.F.R. § 1.767(a)(8).

(i) **Certification Regarding Ownership, Citizenship, Principal Businesses, and Interlocking Directorates¹⁴**

GCICC certifies that it has the following 10-percent-or-greater direct or indirect interest holders:

GCI Holdings, LLC (“GCIH”)

Address: 2550 Denali Street, Suite 1000, Anchorage, Alaska 99503

Place of Organization: Alaska

Principal Business: holding company

Relationship: GCIH holds a 100-percent voting-and-equity interest in GCICC.

Ventures Holdco, LLC (“Ventures Holdco”)

Address: 2550 Denali Street, Suite 1000, Anchorage, Alaska 99503

Place of Organization: Alaska

Principal Business: holding company

Relationship: Ventures Holdco holds a 100-percent voting-and-equity interest in GCIH.

GCI, LLC (“GCI”)

Address: 2550 Denali Street, Suite 1000, Anchorage, Alaska 99503

Place of Organization: Alaska

Principal Business: holding company

Relationship: GCI holds a 100-percent voting-and-equity interest in Ventures Holdco.

GCI Liberty, Inc. (“GCI Liberty”)

Address: 12300 Liberty Boulevard Englewood, Colorado 80112

Place of Organization: Delaware

Principal Business: holding company

Relationship: GCI Liberty holds a 100-percent voting-and-equity interest in GCI.

Dr. John C. Malone

Address: c/o Liberty Interactive Corporation, 12300 Liberty Boulevard, Englewood, Colorado 80112

Citizenship: USA

Principal Business: telecommunications and investments

Relationship: Dr. Malone holds a 27.4-percent voting interest and a 4.0-percent equity interest in GCI Liberty.

¹⁴ See *id.* § 63.18(h).

No other person or entity holds a 10-percent-or-greater direct or indirect voting or equity interest in GCICC. GCICC certifies that it has no interlocking directorates with any foreign carrier.

(ii) Certification Regarding Foreign Carrier Status and Foreign Affiliation¹⁵

GCICC certifies that it:

- (A) is not a foreign carrier in any foreign country;
- (B) does not own or control a cable landing station in any foreign country; and
- (C) is not affiliated with any foreign carrier.¹⁶

(iii) Certifications Regarding Destination Markets¹⁷

GCICC certifies to the following:

- (A) it is not a foreign carrier;
- (B) it does not control a foreign carrier in any country in which the AU-SE system lands (of which there are none);
- (C) no entity owning and controlling it controls a foreign carrier in any foreign country in which the AU-SE system lands (of which there are none); and
- (D) no grouping of two or more foreign carriers in any foreign country in which the AU-SE system lands (or parties that control foreign carriers in which the AU-SE system lands, of which there are none) own, in aggregate, more than 25 percent of it and are parties to, or

¹⁵ See 47 C.F.R. §§ 1.767(a)(8), 63.18(i).

¹⁶ In 2017, in connection with the acquisition of GCICC and its parent companies by GCI Liberty Inc., GCICC disclosed affiliations with foreign carriers based on ownership and control arrangements relating to Liberty Global. See File No. SCL-T/C-20170501-00013. Due to subsequent changes in ownership and governance of the relevant entities, including the spin-off of Liberty Latin America Ltd. from Liberty Global in late 2017, those previously-disclosed foreign carrier affiliates are no longer affiliated with GCICC.

¹⁷ See *id.* §§ 1.767(a)(8), 63.18(j).

beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the AU-SE system in the United States.

(iv) Certification Regarding WTO Status, Market Power, and the Effective Competitive Opportunities Test¹⁸

No response is required, as GCICC did not identify any non-WTO markets in response to 47 C.F.R. § 1.767(a)(8)(iii).

(v) Certifications Regarding the Anti-Drug Abuse Act of 1988¹⁹

GCICC certifies that no party to this application is subject to a denial of federal benefits that includes Commission benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

(9) Certifications Regarding Routine Conditions²⁰

GCICC certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

(10) Certification Regarding Service to Executive Branch Agencies²¹

GCICC has sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense. GCICC's counsel has certified such service in the certificate of service attached to this application.

¹⁸ See *id.* §§ 1.767(a)(8), 63.18(k).

¹⁹ See *id.* §§ 1.767(a)(8), 63.18(o).

²⁰ See *id.* § 1.767(a)(9), (g).

²¹ See *id.* § 1.767(j).

II. REQUEST FOR STREAMLINED PROCESSING

GCICC requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1) and (k)(4).

As identified in Table 1 above, GCICC is not affiliated with a foreign carrier in any foreign country in which the AU-SE system lands (of which there are none, as AU-SE is a domestic system).

GCICC certifies that it is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, 16 U.S.C. § 1456. Alaska, the sole U.S. jurisdiction in which the AU-SE system lands, has not listed a cable landing license as a federal activity requiring a consistency certification.²²

²² In fact, Alaska maintains no list of federal actions requiring consistency certifications. On July 1, 2011, Alaska's legislature decided not renew Alaska's coastal management program, resulting in Alaska's withdrawal from the National Coastal Zone Management Program. *See* NOAA, Alaska Coastal Management Program Withdrawal from the National Coastal Management Program Under the Coastal Zone Management Act (CZMA), 76 Fed Reg. 39,857 (July 7, 2011).

CONCLUSION

For the foregoing reasons, the Commission should expeditiously grant this application pursuant to streamlined processing.

Respectfully submitted,



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July 8, 2020

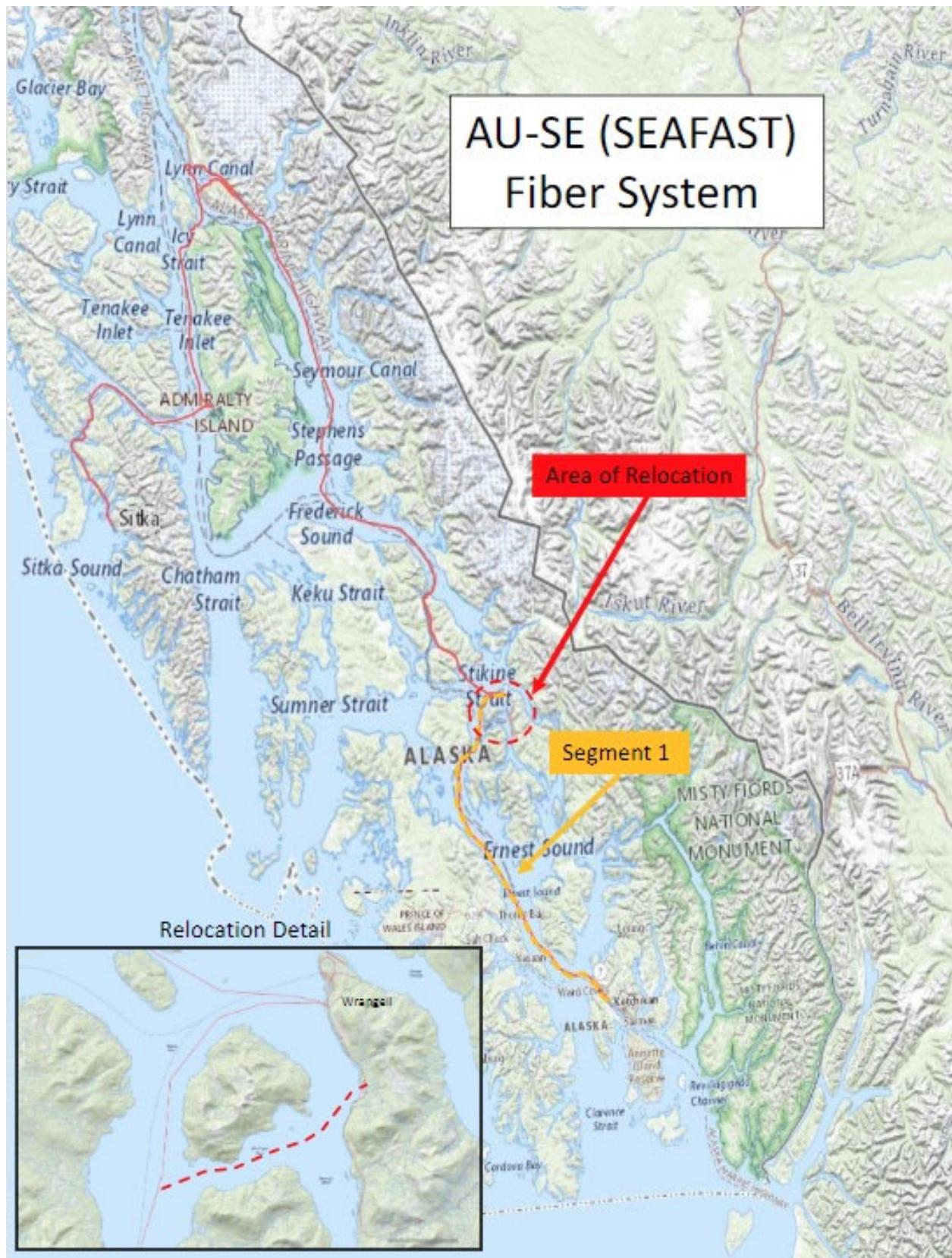
Attachments

LIST OF APPENDICES

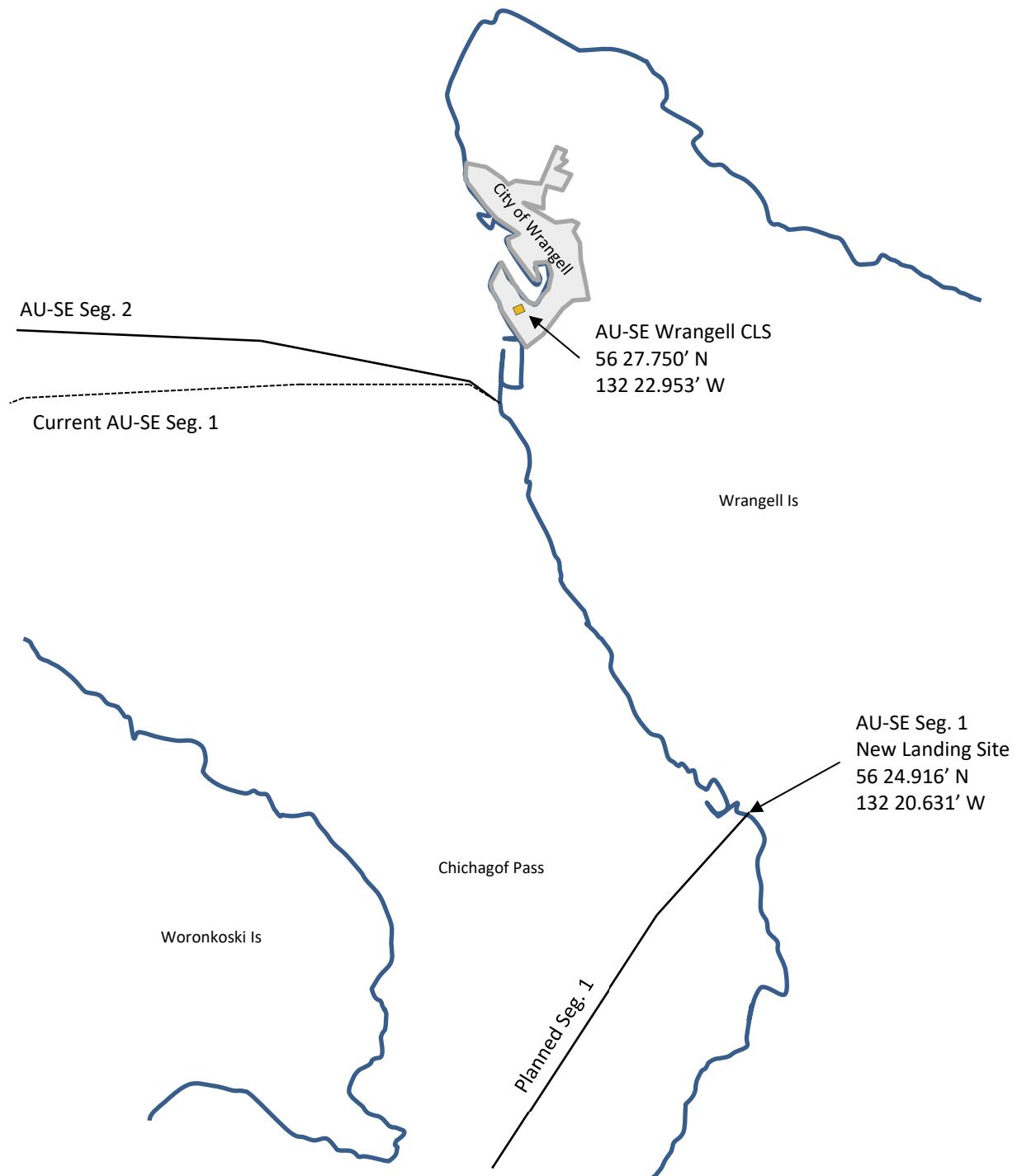
Appendix A: AU-SE Route Map

Appendix B: Existing and New Landing Point Information for Wrangell Landing

APPENDIX A: ROUTE MAP FOR AU-SE SYSTEM



APPENDIX B: MAP SHOWING EXISTING AND NEW GEOGRAPHIC LANDING POINTS



CERTIFICATE OF SERVICE

I, Kent D. Bressie, hereby certify that consistent with 47 C.F.R. § 1.767(j), I have served copies of the foregoing application to modify the AU-SE cable landing license by hand delivery or electronic mail on this 8th day of July 2020, to the following:

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