

VIA IBFS AND ECFS

February 4, 2021

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L St NE
Washington DC, 20554

Re: Applications for Transfer of Control of Northstar License Corporation, IBFS File No. SCL-T/C-20210120-00003, and Alaska Northstar Communications, LLC, IBFS File No. SCL-T/C-20210120-00004; WC Docket No. 21-23

Dear Secretary Dortch:

Alaska Communications Systems Group, Inc. (“Alaska Communications”) and Project 8 Buyer, LLC (“Project 8”) (collectively, the “Parties”) filed applications on January 20, 2021 for Commission approval of a proposed transfer of control, which included the above-referenced applications to transfer control of the cable landing licenses of Northstar License Corporation (“Northstar License”) and Alaska Northstar Communications, LLC (“Alaska Northstar”) from Alaska Communications to Project 8. This letter supplements those applications.

Following close review of Commission records and discussion with the staff of the International Bureau, it is evident that Alaska Northstar does not in fact hold a cable landing license. Although IBFS shows separate 1994 submarine cable landing license file numbers for each of Alaska Northstar and Northstar License,¹ both appear to be associated with the same submarine cable landing license.² Moreover, shortly after the issuance of that cable landing license, the International Bureau in 1997 approved a transfer of control that identified only a single 1994 cable landing license, in addition to a separate cable landing license issued in 1996.³ Removing any possible remaining doubt as to the correct licensee, the International Bureau in 2002 granted an application to assign Alaska Northstar’s interests in the Alaska North Star Cable System to Northstar License.⁴

¹ See File Nos. SCL-LIC-19940617-00001 and SCL-LIC-19940617-00002. Northstar License also holds an additional separate and distinct cable landing license granted in 1996 to expand the cable system into southeast Alaska, *see Alaska Northstar Communications, L.L.C. Application for a License to Land and Operate a Submarine Fiber Optic Cable Extending between Two Cable Landing Points in South Central Alaska, United States*, File No. SCL-96-002, DA 96-1815 (Int. Bur. 1996) (New IBFS File No. SCL-LIC-19960308-00001).

² Both 1994 IBFS file numbers in fact link to the same Cable Landing License granted by the International Bureau, *Alaska Telecom Ltd., L.C. Application for a License to Land and Operate a Submarine Fiber Optic Cable between the Pacific Northwest United States and the State of Alaska U.S.A.*, Cable Landing License, File No. SCL-94-004, 10 FCC Rcd. 6072 (Int. Bur. 1995).

³ See *Alaska Northstar Communications, L.L.C. Transferor, and WCI Cable, Inc. Transferee; Application for Modification of Submarine Cable Landing Licenses*, File Nos. SCL-94-004-TC and SCL-96-002-TC, DA 97-2563, 12 FCC Rcd. 20330 (Int. Bur. 1997).

⁴ See File No. SCL-ASG-20020123-00003.

Finally, when Alaska Communications acquired the North Star Cable System in 2008, the applicants listed only two relevant cable landing license file numbers that were covered by the transfer of control, SCL-LIC-19940617-00002 and SCL-LIC-19960308-00001, both held by Northstar License.⁵

As a result, the Parties hereby supplement the above-referenced applications as follows:

1. To withdraw the Alaska Northstar transfer control application, File No. SCL-T/C-20210120-00004;
2. To request that the International Bureau remove the redundant File No. SCL-LIC-19940617-00001 from the IBFS database; and
3. To make conforming changes to the Northstar License transfer of control application, File No. SCL-T/C-20210120-00003, by (a) striking the references to Alaska Northstar Communications, LLC as a licensee and File No. SCL-LIC-19940617-00001 throughout the document; and (b) clarifying Exhibit 1, Attachment A, Section I.D., with respect to the association of the current and former authorization numbers held by Northstar License (MOD and paired SCL License Nos: SCL-MOD-20020725-00091 (SCL-LIC-19960308-00001) and SCL-MOD-20020725-00090 (SCL-LIC-19940617-00002)).

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Please do not hesitate to contact us with any questions. We greatly appreciate the work of the Commission staff in reviewing the Parties applications and ensuring the accuracy of the Commission's licensing records.

Very truly yours,

/s/ Phillip R. Marchesiello

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⁵ See File No. SCL-T/C-20080423-00007.