

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

Carmell Weathers

Wireline Competition Bureau

Competition Policy Division

Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554



June 6, 2018

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

RE: ACS of Anchorage, LLC Public Notice of Copper Retirement Under 47 C.F.R. § 51.333

Dear Ms. Dortch:

Pursuant to Section 51.333 of the Commission's rules, 47 C.F.R. § 51.333, ACS of Anchorage, LLC hereby submits the attached Public Notice of Copper Retirement Under Section 51.333 of the Commission's rules.

This filing is being made through the FCC's Electronic Comment Filing System.

Please contact me at 907.297.3130 if you have any questions concerning this matter.

Sincerely,

Lisa Phillips Senior Manager, Regulatory Affairs and Risk Management

Attachments



Public Notice of Copper Retirement Under Rule 51.333 ACS of Anchorage, LLC's Internet address: http://www.acsalaska.com

June 14, 2018

RE: Network Change Notification

<u>Carrier</u>: ACS of Anchorage, LLC d/b/a Alaska Communications, 600 Telephone Ave., Anchorage, Alaska 99503

Implementation Date:

This network change has been scheduled for August 1-15, 2018.

Description of the Planned Network Change:

Anchorage Municipal Light and Power has informed Alaska Communications that it will be removing its poles in the Bootleggers Cove area of Anchorage this summer, and that the work will be complete by August 15, 2018. As a result, Alaska Communications is required to remove its aerial copper facilities from those poles before that date. As Alaska Communications did not receive notice of this work more than 90 days in advance of the completion date, it was not possible to comply with the Commission's mandatory 90-day notice period governing retirement of copper. Pursuant to 51.333(g)(2) Alaska Communications requests a limited exemption from advance notice and timing requirements for copper retirement. Alaska Communications expects to complete this work between August 1 and August 15, 2018.

<u>Description of Reasonably Foreseeable Impact(s) of the Planned Change(s):</u>

Alaska Communications provides circuit-switched voice telephone service over copper last mile distribution lines to approximately 40 residential customers in Bootleggers Cove that will be affected by this work, and its lines pass approximately 200 additional customer locations that do not take service from Alaska Communications. The cost of deploying new underground lines to serve this small number of affected customers is economically prohibitive; therefore, Alaska Communications intends to retire the aerial copper lines and not deploy new underground facilities in the area.

<u>Steps Taken to Minimize the Impact of the Reduced Waiting Period on Directly Interconnected Telecommunications Service Providers</u>

Alaska Communications will cooperate and closely coordinate with GCI to ensure the transition proceeds smoothly despite the abbreviated notice period. GCI purchases no unbundled network elements in the affected area. In addition, Alaska Communications will put an agreement in place and provide all necessary information on a timely basis to ensure a smooth transition for any customers electing to purchase resold GCI telephone exchange services. To Alaska Communications' knowledge there will no changes to routing or programming switch tables.

The Planned Network Change Will Occur at the Following Location:

Bootlegger's Cove, Anchorage, Alaska 99501



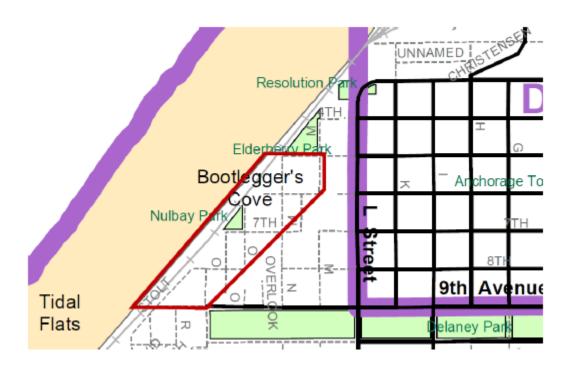
Technical Stuart Chasse, Network Engineering Foreman

Contact 907-564-1789

Interconnection Kerri Lookabaugh, Service Assurance Manager

Contact 907-565-6678





Certificate of Public Notice of Copper Retirement under Section 51.333(a) of the Commission's Rules

I, Lisa Phillips, certify as follows:

On June 6, 2018, I served a copy of the "Public Notice of Copper Retirement under Rule 51.333" relating to a planned retirement of copper in the area of Bootleggers Cove in Anchorage, Alaska, upon each telephone exchange service provider that directly interconnects with the incumbent LEC's network. ACS of Anchorage, LLC, has requested a waiver of the five-day waiting period before filing this Public Notice of Copper Retirement with the Commission. The name and address of each telephone exchange service provider upon which the notice was served is as follows:

Mary Devore Carrier Relations Director GCI Liberty, Inc. 2550 Denali Street, Suite 1000 Anchorage, AK 99503 mdevore@gci.com

Under penalty of perjury, the foregoing is true and correct, to the best of my knowledge, information, and belief.

isa Phillips

Senior Manager, Regulatory Affairs and

Risk Management