

**CONCURRING STATEMENT OF
COMMISSIONER JONATHAN S. ADELSTEIN**

Re: Applications for the Assignment of License from Denali PCS, LLC to Alaska DigiTel, LLC and the Transfer of Control of Interests in Alaska DigiTel, LLC to General Communications, Inc.; Memorandum Opinion and Order; WT Docket No. 06-114

This is a surprisingly complicated set of assignment and transfer of control applications. I cannot recall a transaction that implicates so many of the major communications providers in a market because of a variety of existing overlapping business arrangements and ventures.

I have tried to ask the hard questions regarding this transaction. I have explored the complicated relationships that GCI has with both Alaska DigiTel and Dobson. But it feels like we are leaving a stone unturned here – that there is more to the transaction that meets the eye. While I appreciate the several voluntary conditions advanced by the applicants, I am only able to concur in this transaction. I am concerned that GCI has such a close relationship with Dobson at the same time GCI is acquiring a 78 percent of Alaska DigiTel's membership interests, is receiving certain non-controlling investor protection rights, and has an option to acquire the remaining equity interest in Alaska DigiTel. And I am concerned that GCI has such a close relationship with Alaska DigiTel at the same time GCI has a distribution agreement with Dobson, is leasing PCS spectrum to Dobson pursuant to a long-term *de facto* transfer spectrum leasing arrangement, and has a Letter of Intent with Dobson to possibly pursue further strategic goals. Indeed our own item concludes that the proposed transaction poses a risk of coordinated interaction.

We rightly put in a place conditions regarding the GCI Relationship Officer and on the flow of competitively sensitive information regarding Alaska DigiTel to Dobson employees. These are important steps to limit the transfer of potentially damaging information. I hope they are enough. For the sake of Alaskans, I encourage the Commission to monitor this market carefully to make sure our conditions have the required effect of promoting a vibrant and competitive wireless marketplace.