

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
)  
GCI Communication Corp., ) File No. SCL-LIC-20171031-00024  
)  
Application for a License to Land and )  
Operate a Non-Common Carrier Fiber-Optic )  
Submarine Cable System Connecting )  
Akutan, Dutch Harbor, False Pass, )  
Levelock, and Port Heiden, Alaska, )  
)  
)  
)

**PETITION TO ADOPT CONDITIONS TO  
AUTHORIZATIONS AND LICENSES**

The Department of Homeland Security (“DHS”) hereby submits this Petition to Adopt Conditions to Authorizations and Licenses (“Petition”), pursuant to Section 1.41 of the Federal Communications Commission (“Commission”) rules.<sup>1</sup> Through this Petition, DHS advises the Commission that DHS has no objection to the Commission approving the authority sought in the above-referenced proceedings, provided that the Commission conditions its approval on the commitment of GCI Communication Corporation (“GCICC”) to abide by the undertakings set forth in the June 3, 2019 Letter of Assurances (“2019 LOA”), which is attached hereto as Attachment A. The above-referenced proceedings involve an application seeking Commission approval to land and operate a fiber optic submarine cable system connecting communities in Southwest Alaska and the Aleutian Islands (FCC File No. SCL-LIC-20171031-00024).

The Commission has long recognized that law enforcement, national security, and public safety concerns are part of its public interest analysis, and has accorded deference to the views of

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<sup>1</sup> 47 C.F.R. § 1.41.

other U.S. government agencies with expertise in those areas. *See In the Matter of Comsat Corporation d/b/a Comsat Mobile Communications, etc.*, 16 FCC Rcd. 21,661, 21707 ¶ 94 (2001).

After discussions with representatives of GCICC in connection with the above-referenced proceedings, DHS has concluded that the commitments set forth in the 2019 LOA will help ensure that those agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities. Accordingly, DHS advises the Commission that it has no objection to the Commission granting the applications in the above-referenced proceedings, provided that the Commission conditions its consent on compliance by GCICC with the 2019 LOA.

Respectfully submitted,

/S/ Brien Beattie  
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June 10, 2019

Attachment A (2019 Letter of Assurances)