

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Application of Alaska Communications	)	Call Sign: E170205
Internet LLC to Modify its C-Band Very	)	
Small Aperture Terminal Network License	)	File No. SES-AMD-_____

APPLICATION TO MODIFY C-BAND VSAT BLANKET LICENSE

Pursuant to Section 25.117 of the rules of the Federal Communications Commission (the “FCC” or “Commission”), 47 C.F.R. § 25.117, Alaska Communications Internet LLC (“Alaska Communications Internet”) files this application (the “Application”) to amend its pending application to modify its C-band very small aperture terminal (“VSAT”) network blanket license, Call Sign E170205 (the “License”),¹ by adding **seven** new remote earth station sites (the “Additional Sites”) to its authorized network. The Additional Sites will enable reliable broadband service for students, teachers, and staff in the Lower Yukon School District (LYSD). LYSD encompasses ten villages across 22,000 square miles in remote areas of Alaska that are largely unserved or underserved by terrestrial telecommunications transport networks.

The service will be supported by the Commission’s Emergency Connectivity Fund (“ECF”). Created by the American Rescue Plan Act of 2021 with an appropriation of over \$7 billion,² the ECF helps schools and libraries “meet the need for connected devices and broadband Internet access services to facilitate remote learning during the COVID-19 pandemic for students, school staff, and library patrons.”³ Particularly in the Alaska bush,⁴ services supported by the ECF remain critical to support learning and to close the Homework Gap.

¹ See Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign E170205 and subsequent modification and amendment applications. This application amends SES-MFS-20220804-00834 (the “*Pending MFS Modification*”).

² Pub. L. 117-2 (Mar. 11, 2021).

³ *Establishing Emergency Connectivity Fund to Close the Homework Gap*, WC Docket No. 21-93, Report and Order, FCC 21-58 (rel. May 11, 2021) (“*ECF Program Order*”), at ¶ 16.

⁴ Unlike Alaska’s three largest population centers, and the surrounding rural communities, Alaska bush communities are isolated geographically from infrastructure resources commonly available elsewhere in the state, and the nation

I. Background

Alaska Communications Internet provides critically important broadband and voice-over-Internet Protocol (“VoIP”) services to enterprise, business, educational, health care, and residential customers throughout the state. Its affiliates include the largest incumbent local exchange carriers in the state, providing telecommunications services in Anchorage, Fairbanks and Juneau, in addition to dozens of Alaska’s rural and remote bush communities.⁵

The License authorizes Alaska Communications Internet to operate a network of C-band satellite earth stations used to meet the critical communications needs of a diverse group of users in remote locations in Alaska, including Alaska Native corporations, schools and libraries supported by the Commission’s Schools and Libraries Universal Service Support Mechanism (“E-rate”), rural health care providers supported by the Commission’s Rural Health Care Universal Service Support mechanism, and commercial mining, fishing, and seafood canning businesses, as well as to provide telephone and broadband communications backhaul services connecting telephone central offices operated by Alaska’s small and rural telephone companies.

In the FCC Form 312 Schedule B and Technical Appendix, Alaska Communications Internet provides relevant information relating to the proposed operations at the Additional Sites, including earth station operating parameters and frequency coordination reports and radiation hazard analyses.

as a whole. Most bush communities cannot be accessed by road, nor are they connected to the state’s power grid. To reach these communities, people, as well as goods and services, must arrive by plane, barge, snow machine, all-terrain vehicle, or other off-road transportation means. Communications services in these communities generally must rely on satellite or terrestrial point-to-point microwave transport links to Anchorage, Fairbanks, or Juneau.

⁵ The incumbent local exchange carrier (“ILEC”) subsidiaries of Alaska Communications are: ACS of Anchorage, LLC; ACS of Fairbanks, LLC; ACS of Alaska, LLC; and ACS of the Northland, LLC; *see also* ACS Long Distance, Inc., File Nos. ITC-214-19960612-00248, ITC-T/C-20050822-00382, ITC-T/C-20040414-00190 (International Section 214 authorization).

II. Discussion

This application seeks authority to modify the License, as discussed below.

A. Additional Sites

At each of the following seven Additional Sites, Alaska Communications Internet seeks to operate a C-band satellite earth station under the License that will initially communicate via the EUTELSAT 115WB satellite:

1. **Hooper Bay School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 61° 31' 19.24" N, 166° 5' 47.53" W)
2. **Mountain Village School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 62° 5' 20.62" N, 163° 43' 41.33" W)
3. **Emmonak School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 62° 46' 43.73" N, 164° 31' 48.13" W)
4. **Alakanuk School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 62° 41' 5.32" N, 154° 40' 9.57" W)
5. **Scammon Bay School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 61° 50' 20.49" N, 165° 33' 59.41" W)
6. **Pilot Station School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 61° 56' 10.74" N, 162° 53' 31.19" W)
7. **Russian Mission School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 61° 47' 10.01" N, 161° 19' 33.84" W)

At each site, Alaska Communications Internet will operate a 2.4-meter General Dynamics earth station with a Prodelin antenna, which is electrically identical to the Model 1241 and 1244, which appear on the Commission's Approved Non-Routine Earth Station Antennas List ("Non-Routine Antenna List") and has been previously authorized at various sites under the License.

Moreover, Alaska Communications Internet will operate the earth stations below the maximum EIRP spectral density (“ESD”) levels previously approved by the Bureau.⁶

At each Additional Site, the earth station will be mounted on the roof of an existing building or on a previously installed pole or pad in an area inaccessible to the general public. In each case, the planned location is not among any “districts, sites, buildings, structures or objects, significant in American history, architecture, archeology, engineering or culture, that are listed, or are eligible for listing, in the National Register of Historic Places,”⁷ and thus falls within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.⁸ Accordingly, no environmental assessment is required as part of this application because each proposed site is categorically exempt under Section 1.1306 of the Commission’s rules, 47 C.F.R. § 1.1306.

B. Frequency Coordination

Alaska Communications Internet engaged Micronet Communications, Inc. (“Micronet”) to perform frequency coordination in support of this modification application. Pursuant to Sections 25.115(c)(2)(ii) and 25.203 of the Commission’s rules, 47 C.F.R. §§ 25.115(c)(2)(ii) and 25.203, Micronet has conducted a coordination analysis that considers all existing, proposed, and prior coordinated microwave facilities within the contours of the proposed earth station.

As demonstrated in the attached frequency coordination reports for these sites there is no potential for interference into other users of the C-band spectrum sought herein by Alaska Communications Internet, and it has limited its frequency operations as-needed to accommodate

⁶ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>.

⁷ 47 C.F.R. § 1.1307(a)(4).

⁸ See 47 C.F.R. § 1.1306, Note 1 (“The provisions of §1.1307(a) requiring the preparation of EAs do not encompass the mounting of antenna(s) and associated equipment (such as wiring, cabling, cabinets, or backup-power), on or in an existing building, or on an antenna tower or other man-made structure, unless § 1.1307(a)(4) is applicable.”).

other authorized spectrum users. Alaska Communications Internet currently operates its network with no reported cases of interference and will continue to coordinate any additional hub or remote operations prior to bringing them into use as part of the C-band VSAT network.

C. C-Band Report and Order

In the *C-band Report and Order*, the Commission directed the International Bureau to begin processing earth station applications filed in the 3.7-4.2 GHz band outside the contiguous United States and lifted the filing freeze that was previously in effect with regard to these areas.⁹ Alaska Communications Internet will operate the proposed earth stations in compliance with *C-band Report and Order* by limiting its operations in the 3.7-4.2 GHz band to locations outside of the contiguous United States at all times.¹⁰ In removing the FSS allocation in the 3.7-4.0 GHz band within the contiguous United States, the Commission noted that “locations outside of the contiguous United States, many of which are remote, have a greater need for a wide variety of C-band services”¹¹ and thus maintained the FSS allocation in those regions.¹² In most instances, the C-band services provided by Alaska Communications Internet is the only option available for these remote Alaska Bush villages and businesses and the type of critical C-band services contemplated by the Commission. Accordingly, no waiver of the Commission’s rules is required.

D. Public Interest

Grant of this application will strongly serve the public interest by expanding the availability of affordable broadband services and thereby provide enhanced economic growth

⁹ *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, GN Docket No. 18-122, Report and Order and Order of Proposed Modification, FCC 20-22, 35 FCC Rcd 2343 (2020), at ¶ 149 (“*C-band Report and Order*”), *aff’d sub nom. PSSI Global Servs., LLC v. FCC*, 983 F.3d 1 (D.C. Cir. 2020).

¹⁰ *See C-Band Report and Order* ¶ 132 (finding that, “authorizations for FSS operations outside of the contiguous United States may continue to operate in the entire 3.7-4.2 GHz band”).

¹¹ *Id.*

¹² 47 C.F.R. § 2.106, note NG182(b)

and development opportunities in Alaska.¹³ In general, the earth stations proposed in this Application represent another step toward fulfilling the Commission's vision of universal availability of broadband. As the Commission reiterated in late 2019:

Broadband access is critical to economic opportunity, job creation, education and civic engagement. That is why closing the digital divide is the Commission's top priority. For communities throughout our nation to thrive and prosper, their residents must have the option to obtain high-speed Internet access.¹⁴

These specific sites will advance the vision underlying the ECF, which Chairwoman Rosenworcel called "the largest single effort in our nation's history to make sure students have access to the broadband and devices they need for school. It will help close the Homework Gap so that kids who have been locked out of the virtual classroom can go online for class and do their nightly schoolwork."¹⁵ These earth stations will therefore improve educational and economic opportunities, help close the digital divide, and enhance the wellbeing of the communities they serve.

Specifically, grant of this application will allow Alaska Communications to provide LYSD with broadband connections to promote high-quality education and close the Homework Gap. This connectivity will support the schools and its teachers in fostering the growth and education of Alaskan children, where children from pre-kindergarten to twelfth grade are in attendance.

¹³ See *generally Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17663 (2011) ("*Transformation Order*").

¹⁴ *Rural Digital Opportunity Fund*, WC Docket No. 19-126, Notice of Proposed Rulemaking, FCC 19-77 (rel. Aug. 2, 2019), at ¶ 1.

¹⁵ *ECF Program Order*, Statement of Acting Chairwoman Jessica Rosenworcel.

III. Conclusion

For the foregoing reasons, Alaska Communications Internet requests that the Commission grant this Application to modify the License, E170205, to add the seven Additional Sites, as described herein.