

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Application of Alaska Communications	)	Call Sign: E170205
Internet LLC to Amend a Pending	)	
Application to Modify its C-Band Very	)	File No. SES-AMD-2022____ - _____
Small Aperture Terminal Network License	)	

**APPLICATION TO AMEND PENDING MODIFICATION
OF 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 In this Application, Alaska Communications Internet seeks to replace the currently licensed 3.8-meter antenna at Site #32 (Yakutat) with a 2.4-meter antenna, and adjust the currently licensed site coordinates. Alaska Communications Internet intends to use the replacement antenna at the Yakutat site to provide middle mile backhaul for voice and broadband services supporting businesses and residents in the community of Yakutat.

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.²

¹ See Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign E170205 and subsequent modification and amendment applications. This application further amends SES-MFS-20220804-00834 (the “*Pending MFS Modification*”), in addition to the currently pending amendment, SES-AMD-2022-0929-01044.

² 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).

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.

II. Discussion

This application seeks authority to modify Site #32 (Yakutat) to replace the currently licensed 3.8-meter antenna with a new 2.4-meter antenna at new coordinates, as follows:

- 1. Yakutat**
General Dynamics Prodelin Model 1241 (2.4 meter)
(geographic coordinates: 59° 33' 0.0" N, 139° 43' 48.0" W)

At this site, Alaska Communications Internet now proposes to operate a 2.4-meter General Dynamics Prodelin Model 1241 antenna, which has been previously authorized at various other sites under the License. It is electrically identical to the Model 1244 and other Series 124 Prodelin antennas that appear on the Commission's Approved Non-Routine Earth Station Antennas List ("Non-Routine Antenna List"). Moreover, Alaska Communications

Internet will operate the earth stations below the maximum EIRP spectral density (“ESD”) levels previously approved by the Bureau.³

At the Yakutat site, the replacement 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,”⁴ and thus falls within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.⁵ 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 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 report, 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 other authorized

³ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>.

⁴ 47 C.F.R. § 1.1307(a)(4).

⁵ 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.”).

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.⁶ 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.⁷ 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”⁸ and thus maintained the FSS allocation in those regions.⁹ 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.

⁶ *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).

⁷ 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”).

⁸ *Id.*

⁹ 47 C.F.R. § 2.106, note NG182(b)

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 and development opportunities in Alaska.¹⁰ 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.¹¹

This specific site will allow Alaska Communications Internet to provide critically needed backhaul transport services that will improve the community's middle mile connectivity and help ensure no lapse in critical broadband and other communications services to residents and local businesses. A grant of this application will thus contribute greatly to the regional well-being of the Northwest Arctic Borough of Alaska by helping to improve access to the information resources, as well as educational, healthcare, cultural, and economic opportunities available through broadband connectivity.

III. Conclusion

For the foregoing reasons, Alaska Communications Internet requests that the Commission grant this Application to modify the License, E170205, to reflect the changes to the Company's operations at the Yakutat site described herein.

¹⁰ 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*").

¹¹ *Rural Digital Opportunity Fund*, WC Docket No. 19-126, Notice of Proposed Rulemaking, FCC 19-77 (rel. Aug. 2, 2019), at ¶ 1.