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December 22, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Alaska Communications Internet LLC – Section 1.65 Letter Regarding Application for C-Band Very Small Aperture Terminal (“VSAT”) Blanket License, File No. SES-LIC-20171116-01257, Call Sign 170205

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Commission’s Rules, 47 C.F.R. § 1.65, Alaska Communications Internet LLC (“Alaska Communications Internet”) hereby responds to the Commission’s inquiries received by email from Paul Blais, Chief, Systems Analysis Branch of the Satellite Division, International Bureau, on December 7, 2017, in connection with the above-referenced application for a blanket license to operate a C-band very small aperture terminal (“VSAT”) network in Alaska.

1. Previously Approved Non-Routine Antennas

In its application, Alaska Communications Internet seeks to operate 2 VSAT antenna types – a 2.4m Prodelin (General Dynamics) Model 1244 and a 3.8m Prodelin (General Dynamics) Model 1383. As noted in the Legal Narrative, both antennas are on the Commission’s Approved Non-Routine Antenna List and have been previously approved to operate at off-axis EIRP density levels higher than those proposed by Alaska Communications Internet. Below, Alaska Communications Internet provides citations to some of the applications appearing on the Approved Non-Routine Antenna List that the Commission has previously granted for these antennas.

Prodelin Model 1244

Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075
Intelsat LLC, File No. SES-LIC-20091027-01364, Call Sign E090186
Globe Wireless LLC, File No. SES-LIC-20120116-00058, Call Sign E120017

Prodelin Model 1383

RCN License Subsidiary, Inc., File No. SES-LIC-20050114-00077, Call Sign E050016
RCN License Subsidiary, Inc., File No. SES-LIC-20050517-00611, Call Sign E050142
Public Broadcasting of Colorado, Inc., File No. SES-MOD-20060608-00951, Call Sign E030163
New Life Evangelistic Center Inc., File No. SES-LIC-20080427-00495, Call Sign E080090

2. Environmental Impact Assessment

Environmental impact assessments are not required as part of this application because each proposed site location is categorically exempt under Section 1.1306 of the Commission’s rules, 47 C.F.R. § 1.1306. The hub earth station and test site antenna, both located in Anchorage, Alaska, are existing, longstanding facilities located within the city limits of Anchorage, and that therefore do not involve a site location specified under Section 1.1307(a)(1)-(7) of the Commission’s rules, including sites listed or eligible for listing on the National Register of Historic Places. Moreover, the hub earth station and test site antenna are mounted on an existing antenna structure and existing (non-historic) building, respectively, and, thus, fall within the “man-made structure” exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.¹

The antenna on St. Paul Island, although not previously licensed, is located adjacent to other satellite dish antennae in an existing antenna farm, in accordance with local permitting and siting requirements. The antenna appears in the attached photo at the far left. *See Attachment 1.* It is in a previously disturbed, non-environmentally sensitive area that serves as a utility right-of-way/antenna farm adjacent to a large crab cannery and other structures. As such, it too is categorically exempt under Section 1.1306 and Note 3 to that rule, concerning “antenna farms.”²

3. Scope of Proposed Network

In the Legal Narrative, Alaska Communications Internet stated that it seeks to operate a “network of up to one hundred (100)” VSAT terminals. Alaska Communications Internet clarifies that this initial lead application is for authority to operate two (2) VSAT terminals and one (1) hub facility in Alaska. As the need for additional remote sites arises, Alaska Communications Internet will submit additional, subsequent applications to modify its VSAT blanket license authorization to add new sites, including frequency coordination reports based on its proposed operational parameters and locations at that time.

4. EUTELSAT 115WB Transponder

Alaska Communications Internet has agreed with Eutelsat Americas, the operator of the EUTELSAT 115WB satellite, to lease Transponder C01 from 5929-6001 MHz (Earth-to-space) and 3704-3776 MHz (space-to-Earth).

* * * * *

¹ 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.”).

² See *id.*, Note 3 (“The construction of an antenna tower or supporting structure in an established ‘antenna farm’: (*i.e.*, an area in which similar antenna towers are clustered, whether or not such area has been officially designated as an antenna farm), will be categorically excluded unless one or more of the antennas to be mounted on the tower or structure are subject to the provisions of §1.1307(b) and the additional radiofrequency radiation from the antenna(s) on the new tower or structure would cause human exposure in excess of the applicable health and safety guidelines cited in §1.1307(b).”).

Please do not hesitate to contact me with any questions regarding this matter.

Very truly yours,

/s/

Richard R. Cameron
for Alaska Communications Internet LLC

cc (w/ att.): Paul Blais
Eleanor Lott
Kerry Murray

Attachment 1

