

## **REQUEST FOR WAIVER OF TEMPORARY FILING FREEZE**

Arctic Slope Telephone Assoc Coop, Inc. (“ASTAC”) hereby petitions the International Bureau to waive the temporary freeze on the filing of new applications for fixed- satellite service (“FSS”) earth station licenses in the 3.7-4.2 GHz Band. A waiver in this instance is appropriate as it will “serve the public interest and not undermine the objectives of the freeze.

Previous applications have been submitted and accepted for filing, example SES-LIC-20181031-03653, Call Sign E190040, requesting a waiver for the temporary freeze in the 3.7 – 4.2 GHz Band.

A waiver is appropriate here as well, since ASTAC is facing unique circumstances that warrant a deviation from the Filing Freeze and such deviation will serve the public interest. ASTAC relies on the 3.7 - 4.2 GHz band to provide communications services to rural Alaska.

Alaskan Ku-Band VSAT stations are geographically not available in all markets, limiting broadband deployment opportunities. Access to Ka-Band is lacking and none of the major Ka HTS operators are planning any new satellites that will be able to serve Alaska in the next 5-7 years. Ka-Band is not proven in Northern part of Alaska and not viable near or above the Arctic Circle. The Ka-Band does not have the atmospheric penetration capability of C-Band and is vulnerable to extended outages due to weather.

Allowing ASTAC to file and register for a new C-Band Earth Station would permit ASTAC to continue to offer essential services to rural and remote areas throughout Alaska. ASTAC has no reasonable alternative, as the C-Band presents the only current economically viable option for providing such communications services to these villages on a going-forward basis as attempts to use microwave operations or the Ku-band have failed.

ASTAC has a demonstrated need for this authorization to provide necessary services now and in the future. Accordingly, for good cause shown, ASTAC requests a waiver of the Filing Freeze, consistent with the request for relief set forth herein, and any other such relief as the Bureau may deem proper.