

APPLICATION FOR PERMANENT AUTHORITY

By this application, GCI Communication Corp. (“GCI”) files for permanent authority to provide service via two fixed satellite service (“FSS”) earth stations in the 3.7-4.2 and 5.925-6.425 GHz bands (the “C-Band”).¹ GCI submits this request pursuant to informal FCC Staff discussions and, specifically, is seeking authorization to provide service via 3.6 meter Scientific Atlanta 8136 antenna earth stations (the “Station”) located at Kotzebue, AK to communicate with Galaxy 18 and ANIK F3. The Station is an existing station, currently licensed to and owned by the Federal Aviation Administration (“FAA”), and operating pursuant to a STA granted to GCI.² The site, call sign E960346, is currently part of the FAA Alaskan Satellite Telecommunications Infrastructure (ASTI) program, which links the Alaskan Air Route Traffic Control Center in Anchorage, Alaska with 64 FAA facilities throughout the region.³ This infrastructure provides Alaska with 90 percent of its inter-facility communications for critical, essential and routine air traffic control services supporting commercial aviation.⁴ This includes communications for commercial airline service in Alaska, commercial international over the pole flights, as well as commercial international flights to the Asia-Pacific.

¹ GCI recognizes that there is a current freeze “on the filing of new or modification applications for FSS earth station licenses, receive-only earth station registrations, and fixed microwave licenses in the 3.7-4.2 GHz frequency band.” The freeze on commercial C-band earth station activities does not apply to the operations at issue given their longstanding DBE status. GCI has been granted an STA for operations that are consistent with the request for permanent authority herein (*see* IBFS File No. SES-STA-20190812-01044, granted Aug. 21, 2019), and a grant of this request would allow GCI to continue providing ongoing service via the Station solely to the FAA, which would not change the status quo in terms of earth station operations in the C-Band. Operations would be limited to FAA services. Out of an abundance of caution, if this request is considered a filing prohibited by this freeze, GCI respectfully requests a waiver of the freeze, as a grant of this request would “serve the public interest and not undermine the objectives of the freeze” for the reasons detailed herein. *See Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band, 90 Day Window to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band*, Public Notice, 1, 3, DA 18-398 (rel. Apr. 19, 2018).

² *See* IBFS File No. SES-STA-20190812-01044, granted Aug. 21, 2019.

³ *See* L3Harris, Alaskan Satellite Telecommunications Infrastructure (ASTI) <https://www.harris.com/solution/alaskan-satellite-telecommunications-infrastructure-asti> (last visited Oct. 14, 2019).

⁴ *Id.*

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Grant of this license is necessary for GCI to provide critical telecommunications services in rural Alaska exclusively to the FAA. As documented in Attachment A to this filing, the FAA is migrating from the FAA-owned satellite infrastructure to commercial satellite services provided by L3Harris Technologies and its carrier partners. As documented in Attachment B, L3Harris Technologies has chosen GCI as its carrier partner to provide C-Band satellite communications services at designated locations in Alaska as part of the FAA's ASTI program.

Granting a license to GCI to provide continued FAA service over the C-Band would certainly be in the public interest. Providing critical service to the federal government, and specifically the FAA, is a direct life safety issue for proper aircraft separation and control, and illustrates a "compelling reason" to expeditiously grant the requested license. The service provided by GCI at this site will enable pilots to communicate with one another and air traffic controllers to prevent collisions, accidents, and to preserve human life.