

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

In the Matter of

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

MODIFICATION OF C-BAND VSAT NETWORK LICENSE

Pursuant to Section 25.115(c)(2) of the rules of the Federal Communications Commission (the “FCC” or “Commission”), 47 C.F.R. § 25.115(c)(2), Alaska Communications Internet LLC (“Alaska Communications Internet”) respectfully seeks to modify its existing C-band very small aperture terminal (“VSAT”) network license, Call Sign E170205,¹ by adding one (1) additional earth station site to its authorized network. Consistent with its *VSAT Network License*, Alaska Communications Internet seeks to operate this new site at a fixed location in Alaska in the 3704-3776 MHz (space-to-Earth) and 5929-6001 MHz (Earth-to-space) bands while communicating with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position. Grant of this application will serve the public interest because it will allow Alaska Communications Internet to expand its network and provide broadband connectivity to additional local communities, promoting economic growth and vocational opportunities for residents of the Alaskan Bush.²

¹ See Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign 170205 (“*VSAT Network License*”).

² 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 as a whole. Most Bush communities cannot be accessed by road, and are not 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

I. Background

Alaska Communications Internet is an affiliate of Alaska Communications Systems Group, Inc. (“Alaska Communications”), a publicly-traded company that provides terrestrial wireline telecommunications and broadband-enabled services throughout Alaska as the largest incumbent local exchange carrier in the state.³ Alaska Communications Internet provides essential broadband and voice-over-Internet Protocol (“VoIP”) services to enterprise, business, educational, health care, and residential customers throughout the state.

The *VSAT Network License* presently authorizes Alaska Communications Internet to operate a network of C-band satellite earth stations, in order to provide satellite services to users in remote locations. Currently, the network serves locations that encompass the Alaska Native population of St. Paul Island and the Tanadgusix Corporation (“TDX”), an Alaska Native corporation created pursuant to the Alaska Native Claims Settlement Act (“ANCSA”). In this application, Alaska Communications Internet seeks to incorporate an additional earth station site (coordinates below) that will support a local business co-owned by the Bristol Bay Economic Development Corporation (“BBEDC”). The BBEDC is a not-for-profit company whose mission is to promote economic growth and opportunities for residents of BBEDC’s member communities through sustainable use of the Bering Sea resources.⁴ The earth station itself will be located on an existing pole in an “antenna farm” area adjacent to other antennae and near a commercial site, and will provide broadband connectivity that will support the local fishing and seafood industries,

generally must rely on satellite or terrestrial point-to-point microwave transport links to Anchorage, Fairbanks, or Juneau.

³ 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; and ACS Long Distance, LLC. *See also* ACS Systems, Inc., File No. ITC-214-19980112-00019 (International Section 214 authorization).

⁴ *See* <http://www.bbedc.com>.

helping to improve economic opportunities for these Bristol Bay businesses and their surrounding communities.

In the FCC Form 312 Schedule B and Technical Appendix, Alaska Communications Internet provides relevant information relating to the proposed operations, including earth station operating parameters and a frequency coordination report. At the site, Alaska Communications Internet will operate a 2.4m Prodelin Model 1244 (the “2.4m”), an earth station that is currently licensed in the *VSAT Network License* and on the Commission’s Approved Non-Routine Earth Station Antennas List (“Non-Routine Antenna List”).⁵ At all times, Alaska Communications Internet will operate the earth station below the maximum EIRP spectral density (“ESD”) levels authorized in the *VSAT Network License* and consistent with levels previously approved by the Commission.⁶

II. Discussion

This modification application seeks authority to add one (1) additional earth station site to the *VSAT Network License*, consisting of a previously coordinated 2.4m VSAT remote terminal communicating with the EUTELSAT 115WB satellite in the 3704-3776 MHz (space-to-Earth) and 5929-6001 MHz (Earth-to-space) bands. The continued, full use of the EUTELSAT 115WB

⁵ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>; Letter to Marlene H. Dortch, “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” (filed on Dec. 22, 2017) (*citing* 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).

⁶ The site will utilize an iDirect modem, which assigns individual time slots for the earth station’s transmissions, and thus there is no potential for aggregation of transmissions resulting in an exceedance of the off-axis ESD levels provided in this application.

transponder (*i.e.*, 72 MHz each for uplink and downlink) will ensure Alaska Communications Internet has the operational flexibility and capacity to provide reliable connectivity to this local Alaskan Bush business.⁷

As previously demonstrated by Alaska Communications Internet, full transponder use is imperative to be able to properly scale and offer the most reliable connectivity solutions to the remote communities of Alaska. Limiting operations with EUTELSAT 115WB to 20 MHz in each direction would greatly inhibit the promotion of broadband satellite services to rural United States, slowing the delivery of earth station services to rural Americans.

A. New Excursion Inlet Site Location

Alaska Communications Internet seeks to add one additional site to its authorized C-band VSAT network at Excursion Inlet, Alaska (geographic coordinates: 58° 24' 55.3" N, 135° 26' 36.4" W).

As noted, this site will use the identical 2.4m VSAT earth station that is authorized in the *VSAT Network License* for similar fixed C-band operations and is on the Commission's Non-Routine Antenna List.⁸ Although the 2.4m earth station does not comply with the gain mask in Section 25.209 of the Commission's rules, Alaska Communications Internet demonstrates in the attached FCC Form 312 Schedule B that it will operate the station at maximum ESD levels below

⁷ Based on consultation with Commission staff, Alaska Communications Internet understands that, the 20 MHz limitation of Section 25.115(c)(2)(i)(B) of the Commission's rules notwithstanding, 47 C.F.R. § 25.115(c)(2)(i)(B), a grant of this Application will permit the new site to use the full 72 MHz transponder frequency range authorized under the existing terms of the *VSAT Network License*. See *FWCC Request for Declaratory Ruling on Partial-Band Licensing of Earth Stations in the Fixed-Satellite Service That Share Terrestrial Spectrum*, Report and Order, FCC 01-177, RM-9649 (2001), ¶ 13 ("CSAT Report & Order"). To the extent that any additional explicit Commission authority is necessary, Alaska Communications Internet so requests it.

⁸ *Supra* n.6 *see, e.g.*, Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075.

those currently authorized in the *VSAT Network License* and in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules.⁹

The earth station antenna will be installed on an existing pole approximately ten feet in height, located in disturbed areas adjacent to a seafood processing facility and other satellite earth station antennae. Accordingly, no environmental assessment is required as part of this application because the proposed site is categorically exempt under Section 1.1306 of the Commission's rules. Specifically, the existing pole on which the earth station will be mounted does not include 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",¹⁰ and thus falls within the "existing structure" exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.¹¹ Furthermore, the earth station will be located adjacent to other satellite dish antennae in an existing antenna farm. As such, it is also categorically exempt under Section 1.1306 and Note 3 to that rule, concerning "antenna farms."¹²

⁹ See 47 C.F.R. § 25.218(d).

¹⁰ 47 C.F.R. § 1.1307(a)(4).

¹¹ 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.").

¹² 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).").

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 on behalf of Alaska Communications Internet that considers all existing, proposed and prior coordinated microwave facilities within the contours of the proposed earth station at Excursion Inlet.

As demonstrated in the attached frequency coordination report, there is no potential for interference between other users of the C-band spectrum and the operations at the proposed site requested herein by Alaska Communications Internet. At the site, Alaska Communications Internet’s proposed operations in the 3704-3776 MHz (space-to-Earth) and 5929-6001 MHz (Earth-to-space) bands are fully compatible with other FCC-licensed operations in the band.

To this date, no objections have been received from incumbent licensees and Alaska Communications Internet currently operations with no reported cases of interference. Pursuant to Commission rules, Alaska Communication Internet intends to commence earth station operations at the new site immediately after the public notice is released.¹³ Alaska Communications Internet will coordination any future hub or remote locations prior to bringing them into use as part of the C-band VSAT network.

C. Public Interest

Grant of this application will strongly serve the public interest by allowing Alaska Communications Internet to provide reliable broadband services to remote Alaskan businesses, helping to foster local economic growth and educational and employment opportunities for

¹³ See 47 C.F.R. § 25.115(c)(2)(iv).

residents. By directly supporting BBEDC businesses, Alaska Communication Internet is helping to enhance regional economy through revenues earned from investments in the ground fishing industry and promote fishery-related occupational programs and training for residents of the Bristol Bay region.

III. Conclusion

Based on the foregoing, Alaska Communications Internet respectfully requests that the Commission grant this application to modify its existing license, Call Sign E170205, by adding an additional earth station site in Alaska, Excursion Inlet, to its authorized C-band VSAT network.