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By Electronic Filing

July 9, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Alaska Communications Internet, LLC, Section 1.65 Letter,
Call Sign E170205, File No. SES-MOD-20180626-01472

Dear Ms. Dortch:

Alaska Communications Internet, LLC ("Alaska Communications") filed the above-referenced application to modify its C-band earth station network license over a year ago, on June 26, 2018, together with a request for waiver of the Commission's C-band filing freeze.[1]

In response to questions raised at a recent meeting with representatives of the International and Wireless Telecommunications Bureaus,[2] and in light of the passage of time since the filing, Alaska Communications takes this opportunity to update the record in support of its waiver request.

The record accumulated in GN Docket No. 18-122 strongly supports preservation of the entire 3.7-4.2 GHz band for satellite downlink communications in Alaska. Satellite services are the most reliable and cost-effective way (and often the only feasible way) to communicate with native Alaskan villages and other remote Bush communities. Given the state's extreme northerly latitudes and harsh weather, the C-band offers better performance, availability, and coverage than other satellite spectrum bands, making it far superior to other spectrum for serving customers in Alaska. Over much of the year, dangerous and unpredictable conditions make it difficult at best

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[1] See Public Notice, GN Docket Nos. 17-183, 18-122, 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 the 3.7-4.2 GHz Band, DA 18-398, 33 FCC Rcd 3841 (International, Public Safety and Homeland Security, and Wireless Telecommunications Bureaus 2018); Public Notice, GN Docket Nos. 17-183, 18-122, International Bureau Announces 90-Day Extension of Filing Window, to October 17, 2018, to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band; Filing Options for Operators with Multiple Earth Station Antennas, DA 18-639, 33 FCC Rcd. 6115 (Int. Bur. 2018).

[2] *See Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band*, GN Docket No. 18-122, *Ex Parte* Letter from Richard R. Cameron, Counsel to Alaska Communications (filed June 21, 2019).

for Alaska Communications network technicians to reach remote customer sites, making service reliability a paramount concern.

Reliable communications are particularly important in the case of schools, libraries, and rural healthcare providers, which use services supported by the Commission's schools and libraries ("E-rate") and rural health care ("RHC") universal service support mechanisms for the benefit of rural and remote Alaskan communities. Alaska Communications uses C-band satellite earth stations to provide E-rate and RHC-supported services, including those that would be delivered to the Kuspuk School District along the Kuskokwim River in southwest Alaska, using the earth stations proposed in this application.

More broadly, our customers, including rural health care providers, the Federal Aviation Administration, other federal and state government entities, public safety first responders, native-owned economic development enterprises, and others routinely insist on receiving C-band services specifically because they know that they consistently perform more reliably than Ku- or Ka-band alternatives. In fact, when its previous contract expired, the Kuspuk School District chose service offered by Alaska Communications over that of its former service provider, in part because Alaska Communications offered a C-band solution instead of Ku-band.

In contrast to the importance of the 3.7-4.2 GHz spectrum for satellite communications, existing spectrum allocations provide sufficient capacity to support deployment of terrestrial mobile 5G services, such that no new allocation is needed.[3] In large cities in the lower 48 states, population density may range into the tens of thousands of people per square mile. New York City, for example, has over 27,000 people per square mile, and over 69,000 people per square mile in Manhattan. Alaska's small population and low population density stand in sharp contrast, with Anchorage, the most densely populated city in Alaska, having 171 people per square mile.

Alaska Communications recognizes that, despite the clear and compelling reasons to retain the 3.7-4.2 GHz band for satellite communications in Alaska that are reflected in the record in GN Docket No. 18-122, questions concerning the reallocation of spectrum in the 3.7-42 GHz band remain pending before the Commission. While Alaska Communications believes that the Commission should not reallocate this spectrum in Alaska to any other use, the company also recognizes that a grant of this waiver would not make it exempt from a future transition involving this spectrum, should the Commission so mandate.

Continued uncertainty in this matter is hindering the efforts of Alaska Communications to meet customer demand for C-band services, and to make ongoing investment in bringing reliable

[3] *See, e.g.,* Press Release, GCI Liberty, "GCI Partners with Global Technology Leader Ericsson to Deliver First 5G Service to the Last Frontier," June 18, 2019 ("GCI controls 210 MHz (megahertz) of mobile radio spectrum in Anchorage, more than any other wireless provider including low-band 600MHz, 700MHz, and 850MHz spectrum, which is particularly useful for in-door coverage, and mid-band PCS and AWS spectrum. GCI's 5G NR deployment will take advantage of all five of these radio bands to ensure a superior experience for Anchorage residents."), *available at:* https://generalcommunicationinc-redesign.gcs-web.com/news-releases/news-release-details/gci-partners-global-technology-leader-ericsson-deliver-first-5g.

C-band connectivity to remote Alaskan communities. For these reasons, in light of the special circumstances and public interest considerations surrounding the delivery in Alaska of C-band satellite connectivity, Alaska Communications renews its request that the Bureau expeditiously grant its request for waiver and this application.

Please direct any questions regarding this matter to me.

Very truly yours,

Digitally signed by Richard R. Cameron
Date: 2019.07.09 20:23:35 -04'00'

Richard R. Cameron
Counsel for Alaska Communications Internet, LLC