



July 22, 2019

VIA IBFS

International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

Re: GCI Communication Corp.  
Supplement to Pending Earth Station Modification Applications

To Whom it May Concern:

GCI Communication Corp. (“GCI”) is the licensee of the C-Band fixed satellite earth stations (the “Earth Stations”) listed on the attached spreadsheet. Due to a currently-utilized C-Band satellite reaching end-of-life, GCI needs to move its operations to a different C-Band satellite in order to continue providing services on its existing Earth Stations. GCI must transition these Earth Stations to the new spacecraft beginning in **September 2019**.

To effect this transition, on October 30, 2018, GCI submitted modification applications for the Earth Stations to modify the western limit of the satellite arc to permit operation on the new satellite.<sup>1</sup> Such modifications should be considered to be a request to “correct the location or other required data in the IBFS file,” which are specifically contemplated by the Filing Freeze PN.<sup>2</sup> However, in an abundance of caution, GCI also submitted waiver requests in conjunction with each modification application.

GCI urges the FCC to act expeditiously to grant the pending applications listed in the attached spreadsheet by no later than **September 3, 2019**.

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<sup>1</sup> GCI also corrected certain Earth Stations’ geographic coordinates for accuracy pursuant to GCI’s overall review of its earth station licenses in connection with the Filing Freeze. For such Earth Stations, the modification application also involves a change in the earth station’s geographic coordinates of more than +/- 1 second in latitude or longitude from the filed coordinates. Pursuant to the Filing Freeze PN, the International Bureau specifically stated that the freeze “does not extend to . . . modifications to correct location or other data required in the earth station file.” Accordingly, such a modification is consistent with the Filing Freeze PN. However, GCI included a waiver request for such modifications as well, in an abundance of caution, to ensure that its proposed changes are accepted by the Commission.

<sup>2</sup> 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, DA 18-398 (rel. Apr. 19, 2018) (“Filing Freeze PN”); see also *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*, GN Docket Nos. 17-183, 18-122, Public Notice, DA 18-639 (IB June 21, 2018); *International Bureau Announces Two-week Extension of Filing Window for Earth Stations Currently Operating in 3.7-4.2 GHz Band*, GN Docket No. 18-122, DA 18-1061 (October 17, 2018).

Accordingly, and pursuant to discussions with FCC International Bureau Staff, GCI submits this letter to supplement the pending applications listed in the attached spreadsheet.<sup>3</sup>

Please direct any questions to the undersigned.



Kara Leibin Azocar  
Regulatory Counsel, Federal Affairs  
GCI Communication Corp.

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<sup>3</sup> While the majority of applications listed on the attached spreadsheet are modification applications, GCI has also included a new license application and accompanying STA request for the Kotlik location, which is also a necessary component of GCI's transition to the new satellite. GCI will be providing additional information for this application in a separate supplement.

<b>Location</b>	<b>Callsign</b>	<b>File#</b>	<b>Filed date</b>	<b>PN Date</b>
Kotlik	E020088	SES-LIC-20190509-00583	5/9/2019	None
Kotlik	E020088	SES-STA-20190509-00582	5/9/2019	None
Selawik	E960454	SES-MOD-20181030-03708	10/30/2018	None
Buckland	E960451	SES-MOD-20181030-03710	10/30/2018	None
Dutch Harbor	E900261	SES-MOD-20181030-03712	10/30/2018	None
Kiana	E960458	SES-MOD-20181030-03714	10/30/2018	None
Shungnak	E960456	SES-MOD-20181030-03719	10/30/2018	None
Kobuk	E960457	SES-MOD-20181030-03724	10/30/2018	None
Point Hope	E960461	SES-MOD-20181030-03731	10/30/2018	None
Levelock	E960437	SES-MOD-20181030-03732	10/30/2018	None
Ambler	E960459	SES-MOD-20181030-03733	10/30/2018	None
Anaktuvuk Pass	E960394	SES-MOD-20181030-03734	10/30/2018	None
Atqasuk	E960398	SES-MOD-20181030-03736	10/30/2018	None
Kivalina	E960460	SES-MOD-20181030-03740	10/30/2018	None
Deering	E960452	SES-MOD-20181030-03744	10/30/2018	None
Kotzebue	E960386	SES-MOD-20181030-03745	10/30/2018	None
Kodiak	E890566	SES-MOD-20181030-03746	10/30/2018	None
Noatak	E960395	SES-MOD-20181030-03750	10/30/2018	None
Wainwright	E960393	SES-MOD-20181030-03754	10/30/2018	None