

January 3, 2020

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 Application SES-MOD-20181030-03762 IBFS Call Sign E020133

To Whom it May Concern:

GCI Communication Corp. ("GCI") is the licensee of the C-Band fixed satellite earth station (the "Earth Station") associated with pending earth station modification application SES-MOD-20181030-03762, filed Oct. 30, 2018, and IBFS Call Sign E020133. 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 this Earth Station to the new spacecraft beginning in **February 2020**.

To affect this transition, on October 30, 2018, GCI submitted modification applications for Earth Stations to modify the western limit of the satellite arc to permit operation on the new satellite. Numerous such modification applications were granted in September 2019, and GCI follows up to seek similar grant for the Earth Station.<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 a waiver request in conjunction with each modification application.

GCI urges the FCC to act expeditiously to grant the pending application SES-MOD-20181030-03762 by no later than **February 15, 2019**.

Accordingly, and pursuant to discussions with FCC International Bureau Staff, GCI submits this letter to supplement the pending application listed SES-MOD-20181030-03762.

<sup>&</sup>lt;sup>1</sup> See, e.g. SES-MOD-20181030-03746, granted September 10, 2019 (IBFS Call Sign E890566).

<sup>&</sup>lt;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).

Please direct any questions to the undersigned.

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