

## EXHIBIT 1

### APPLICATION FOR MODIFICATION AND WAIVER REQUEST (Response to FCC Form 312, Question 43)

Pursuant to 47 C.F.R. § 25.117, Alascom, Inc. (“Alascom”) respectfully seeks to modify its Chisana earth station (Call Sign E980021) to replace the existing C-band antenna with a new smaller antenna, add emission designators appropriate for the new antenna, and revise the authorized geographic coordinates. Alascom certifies under 47 C.F.R. § 25.117(c) that the remaining license information has not changed, and such information is incorporated by reference.<sup>1</sup>

#### I. BACKGROUND AND SUMMARY.

As a result of on-going power issues at the existing Chisana, AK earth station location, Alascom hereby seeks modification of its Chisana authorization to relocate the earth station to a new site roughly 2 miles from the current Chisana, AK earth station location and change the antenna to a 2.4 m antenna on a permanent, fixed basis. Operations at the existing Chisana, AK site will be discontinued.

#### II. THE APPLICATION REQUESTS AUTHORIZATION FOR AN APPROVED NON-ROUTINE EARTH STATION ANTENNA.

The antenna is a Prodelin 1244 2.4 m antenna that does not strictly comply with 47 C.F.R. § 25.209 and is not eligible for routine processing pursuant to section 25.218(d) of the Commission’s rules.<sup>2</sup> The antenna pattern contained in this application exceeds the section 25.209 sidelobe specification for sidelobe envelope in the ± 1 to 2.0 region. Outside the main beam, the antenna meets the requirements of section 25.209.

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<sup>1</sup> See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SES-01011, File No. SES-RWL-20080219-00169 (Feb. 27, 2008).

<sup>2</sup> 47 C.F.R. §§ 25.209 and 25.218(d).

In the *Part 25 Earth Station Fifth Report and Order*, the Commission directed the International Bureau to create a list of approved non-routine earth station antennas and concluded that the list could be used to help applicants in preparing applications for non-routine processing and expedite review of these applications.<sup>3</sup> The information in the application of previously licensed Prodelin 1244 2.4 meter earth stations<sup>4</sup> indicates that the 2.4 meter antenna proposed in this application will operate in accordance with the FCC's two-degree spacing policy.<sup>5</sup>

Similar to the antennas referenced in the above cited applications, the maximum input spectral power density into the antenna for the proposed 2.4 m Prodelin antenna will not exceed -3.9 dBW/4 kHz. This value is below the maximum allowed of -2.7 dBW/4KHz by a margin of 1.2 dB, with a Maximum EIRP Density per carrier is 38.1 dBW/4kHz. Thus, the proposed transmissions will not cause greater interference than permitted by the FCC's rules.

Alascom agrees to accept any adjacent satellite interference in the receive band as a result of the performance of this antenna. Alascom understands that no additional adjacent satellite interference protection will be available in regions where the antenna does not comply with Section 25.209 of the Commission's rules. Alascom understands that adjacent satellite

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<sup>3</sup> *2000 Biennial Regulatory Review -- Streamlining and Other Revisions of Part 25 of the Commission's Rules Governing the Licensing of, and Spectrum Usage by, Satellite Network Earth Stations and Space Stations*, Fifth Report and Order, IB Docket No. 00-248, 20 FCC Rcd 5666 (2005) (“Part 25 Earth Station Fifth Report and Order”); *see also International Bureau Establishes Website for List of Previously Approved Non-Routine Earth Station Antennas*, Public Notice, DA 09-425 (Feb. 23, 2009).

<sup>4</sup> *See, e.g., Policy Branch Information; Actions Taken*, Public Notice, Report No. SES-01450, File No. SES-LIC-20120116-00058 (May 16, 2012); *Policy Branch Information; Actions Taken*, Public Notice, Report No. SES-01203, File No. SES-LIC-20091027-01364 (Dec. 16, 2009).

<sup>5</sup> *See Approved Non-Routine Earth Station Antennas*, C-band (last visited Mar. 31, 2021), <https://www.fcc.gov/approved-non-routine-earth-station-antennas>.

interference protection applies only to the extent of the criteria set forth in Section 25.209.

Should the use of this antenna cause interference to other systems, Alascom agrees to terminate transmission upon notice.

### **III. GRANT OF THE APPLICATION IS IN THE PUBLIC INTEREST.**

The public interest would be served by grant of this application because the proposed relocation is an intra-county move—approximately 2 miles from the current location—and employs an antenna model already approved by the Commission for a non-routine fixed, C-band earth station. This modification will serve the public interest by facilitating uninterrupted communications in and around Chisana. This in turn will improve the service performance and reliability of Alascom's Alaskan network, thereby promoting the public interest.

Accordingly, Alascom respectfully requests that the Commission grant this application.