

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

In the Matter of

Application of Alaska Communications ) Call Sign: E170205  
Internet LLC to Modify its C-Band Very )  
Small Aperture Terminal Network License ) File No. SES-MOD-\_\_\_\_\_

**APPLICATION TO MODIFY C-BAND VSAT BLANKET LICENSE**

Pursuant to Section 25.117 of the rules of the Federal Communications Commission (the “FCC” or “Commission”), 47 C.F.R. § 25.117, Alaska Communications Internet LLC (“Alaska Communications Internet”) files this application (the “Application”) to modify its C-band very small aperture terminal (“VSAT”) network blanket license, Call Sign E170205 (the “License”),<sup>1</sup> by adding three (3) new remote earth station sites (the “Additional Sites”)<sup>2</sup> to its authorized network, and updating fourteen (14) other sites (the “Modified Sites”) currently included in the License. Both the Additional Sites and the Modified Sites will support voice and broadband services to diverse customers in remote and inaccessible areas of Alaska that are unserved or underserved by terrestrial telecommunications transport networks.

Alaska Communications Internet seeks to operate the Additional Sites to: (i) support the Kotlik School in the Lower Yukon School District to provide services to its teachers and students, fostering the growth of Alaskan children; (ii) provide Trident Seafood Corporation (“Trident”) with reliable broadband services at its False Pass facility to support its operations, management and personnel, manage logistics, coordinate shipments and keep its employees connected to their families; and (iii) operate a new 7.0 hub earth station at its existing hub facility in Anchorage, Alaska to maximize operational flexibility and improved end-to-end

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<sup>1</sup> See Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign E170205, and subsequent modification and amendment applications.

<sup>2</sup> The Additional Sites currently operate pursuant to special temporary authority (*see* Alaska Communications Internet LLC, File No. SES-STA-20210609-00921 (“*June 2021 STA*”) and Alaska Communications Internet proposes the identical operations herein.

communications of the network. Alaska Communications also proposes to modify certain operating parameters of fourteen (14) currently licensed sites in order to provide greater operational flexibility and increase bandwidth in response to customer needs, particularly in light of the ongoing transition of C-band spectrum to terrestrial use in the Lower 48 contiguous states.

In general, with this modification, Alaska Communications Internet will be able to provide expanded telecommunications connectivity in extremely remote areas of the Alaska Bush to help bridge the digital divide in some of the nation's most isolated communities.<sup>3</sup> Grant of this modification application will further serve the public interest because it will enable Alaska Communications Internet to optimize the ground station infrastructure at the Modified Sites to provide higher quality service to its customers and provide broadband connectivity to additional local communities and schools, promoting economic growth, education, and vocational opportunities for residents of the Alaska Bush.

## **I. Background**

Alaska Communications Internet is an affiliate of Alaska Communications Systems Group, Inc. (“Alaska Communications”), a publicly-traded company that, through its subsidiaries, provides terrestrial wireline telecommunications and broadband-enabled services throughout Alaska as the largest incumbent local exchange carrier in the state.<sup>4</sup> Alaska Communications

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<sup>3</sup> 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, nor are they 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 generally must rely on satellite or terrestrial point-to-point microwave transport links to Anchorage, Fairbanks, or Juneau.

<sup>4</sup> 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; *see also* ACS Long Distance, Inc., File Nos. ITC-214-19960612-00248, ITC-T/C-20050822-00382, ITC-T/C-20040414-00190 (International Section 214 authorization).

Internet provides essential broadband and voice-over-Internet Protocol (“VoIP”) services to enterprise, business, educational, health care, and residential customers throughout the state.

The License authorizes Alaska Communications Internet to operate a network of C-band satellite earth stations used to meet the critical communications needs of a diverse group of users in remote locations in Alaska, including Alaska Native corporations, schools and libraries supported by the Commission’s Schools and Libraries Universal Service Support Mechanism (“E-rate”), rural health care providers supported by the Commission’s Rural Health Care Universal Service Support mechanism, and commercial mining, fishing, and seafood canning businesses, as well as to provide telephone and broadband communications backhaul services connecting telephone central offices operated by Alaska’s small and rural telephone companies.

In the FCC Form 312 Schedule B and Technical Appendix, Alaska Communications Internet provides relevant information relating to the proposed operations at the Additional Sites and Modified Sites, including earth station operating parameters and frequency coordination reports and radiation hazard analyses.

## **Discussion**

This application seeks authority to modify the License, as discussed below.

### **A. Additional Sites**

Alaska Communications Internet seeks to add the following three (3) sites to the License to operate a C-band satellite earth station that will initially communicate via the EUTELSAT 115WB satellite with the Alaska Communications Internet network hub:

1. **Kotlik School**  
General Dynamics Prodelin Model 1241 (2.4-meter)  
(geographic coordinates: 63° 1’ 53.0” N, 163° 33’ 17.0” W)
2. **Trident False Pass**  
General Dynamics Prodelin Model 1241 (2.4-meter)  
(geographic coordinates: 54° 51’ 54.0” N, 163° 24’ 41.0” W)

**3. Anchorage 7.0m Hub**

RSI Satcom 705CS (7-meter)

(geographic coordinates: 61° 8' 28.4" N, 149° 52' 30.7" W)

At the Kotlik and Trident sites, Alaska Communications Internet will operate a 2.4m General Dynamics (the "2.4m") earth station with a Prodelin antenna, which is on the Commission's Approved Non-Routine Earth Station Antennas List ("Non-Routine Antenna List") and authorized at various sites under the License. Moreover, Alaska Communications Internet will operate the earth stations below the maximum EIRP spectral density ("ESD") levels previously approved by the Commission.<sup>5</sup> At the Anchorage site, Alaska Communications Internet will operate the 7.0m RSI Satcom Model 705CS, an antenna type that has been previously licensed by the Commission for near identical earth station operations and currently operates without incident under the *June 2021 STA*.<sup>6</sup>

**B. Modified Sites**

In addition to the sites listed above, Alaska Communication Internet seeks to update fourteen (14) sites currently licensed under the License:

**1. Anchorage 3.8m Hub**

General Dynamics Prodelin Model 1383 (3.8-meter)

(geographic coordinates: 61° 8' 28.4" N, 149° 52' 30.7" W)

**2. Anchorage 2.4 Test Site**

General Dynamics Prodelin 1244 (2.4-Meter)

(geographic coordinates: 61° 8' 28.4" N, 149° 52' 30.7" W)<sup>7</sup>

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<sup>5</sup> See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>.

<sup>6</sup> See Globecast America Incorporated, *Radio Station Authorization*, File No. SES-LIC-20200821-00897, Call Sign E881143 (Sep. 30, 2020) ("*Globecast License*"). Although the EIRP density levels proposed herein by Alaska Communications Internet are slightly higher than the *Globecast License*, its operations have been fully coordinated and limited as necessary, effectively eliminating the potential for harmful interference.

<sup>7</sup> Updated geographic coordinates.

3. **Naknek**  
General Dynamics Prodelin 1244 (2.4-Meter)  
(geographic coordinates: 58° 43' 43.7" N, 157° 0' 0.9" W)
4. **Alitak**  
General Dynamics Prodelin 1244 (2.4-Meter)  
(geographic coordinates: 56° 53' 53.7" N, 154° 14' 47.4" W)
5. **Excursion Inlet**  
General Dynamics Prodelin 1244 (2.4-Meter)  
(geographic coordinates: 58° 24' 55.3" N, 135° 26' 36.4" W)
6. **St. Paul**  
General Dynamics Prodelin 1383 (3.8-Meter)  
(geographic coordinates: 57° 7' 23.0" N, 170° 16' 45.0" W)
7. **Silver Bay False Pass**  
General Dynamics Prodelin 1385 (3.8 Meter)  
(geographic coordinates: 54° 52' 4.5" N, 163° 24' 35.1" W)<sup>8</sup>
8. **Aniak District Office**  
General Dynamics Prodelin Model 1244 (2.4-meter)  
(geographic coordinates: 61° 34' 55.1" N, 159° 32' 18.0" W)
9. **Aniak Junior Senior High School (JSHS)**  
General Dynamics Prodelin Model 1244 (2.4-meter)  
(geographic coordinates: 61° 34' 48.3" N, 159° 33' 6.7" W)
10. **Auntie Mary Nicoli Elementary School (AMNES)**  
General Dynamics Prodelin Model 1244 (2.4-meter)  
(geographic coordinates: 61° 34' 49.0" N, 159° 31' 51.1" W)
11. **Crown Village Sam School (CVSS)**  
General Dynamics Prodelin Model 1244 (2.4-meter)  
(geographic coordinates: 61° 34' 23.1" N, 159° 14' 57.1" W)
12. **Jack Egnaty Senior School (JESS)**  
General Dynamics Prodelin Model 1244 (2.4-meter)  
(geographic coordinates: 61° 42' 9.1" N, 157° 10' 14.1" W)
13. **Gusty Michael School (GMSHS)**  
General Dynamics Prodelin Model 1244 (2.4-meter)  
(geographic coordinates: 61° 47' 13.6" N, 156° 35' 17.7" W)
14. **Johnnie John Sr School (JJSS)**  
General Dynamics Prodelin Model 1244 (2.4-meter)  
(geographic coordinates: 61° 51' 48.6" N, 158° 8' 18.2" W)

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<sup>8</sup> Updated geographic coordinates.

At each Modified Site, Alaska Communications Internet has re-coordinated its operations and is proposing to operate at higher power levels than those currently authorized in License,<sup>9</sup> as well as with an expanded satellite arc and, in some cases, in additional frequencies within the C-band, in an initiative to maximize operational flexibility across its network.

At each Additional Site and Modified Site, the earth station will be mounted on the roof of an existing building or on a previously installed pole in an area inaccessible to the general public. In each case, the planned location is not among 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,”<sup>10</sup> and thus falls within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.<sup>11</sup> Accordingly, no environmental assessment is required as part of this application because each proposed site is categorically exempt under Section 1.1306 of the Commission’s rules, 47 C.F.R. § 1.1306.

Additionally, at each site operating with the larger satellite arc of 95°-191°, Alaska Communications Internet has added additional points of communication, the Galaxy 30 and AMC-6 satellites. This is reflected at several of the Additional Sites and Modified Sites, as reflected in this application’s Form 312 Schedule B.

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<sup>9</sup> With the exception of the Silver Bay False Pass, Aniak District Office and GMSHS sites, where Alaska Communications Internet will operate at the same power levels currently authorized in the License. In the case of Silver Bay False Pass, Alaska Communications Internet also updates the geographic coordinates.

<sup>10</sup> 47 C.F.R. § 1.1307(a)(4).

<sup>11</sup> 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.”).

### **C. 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 that considers all existing, proposed, and prior coordinated microwave facilities within the contours of the proposed earth station.

As demonstrated in the attached frequency coordination reports for these sites there is no potential for interference into other users of the C-band spectrum sought herein by Alaska Communications Internet, and it has limited its frequency operations as-needed to accommodate other authorized spectrum users. Alaska Communications Internet currently operates its network with no reported cases of interference and will continue to coordinate any additional hub or remote operations prior to bringing them into use as part of the C-band VSAT network.

### **D. C-Band Report and Order**

In the *C-band Report and Order*, the Commission directed the International Bureau to begin processing earth station applications filed in the 3.7-4.2 GHz band outside the contiguous United States and lifted the filing freeze that was previously in effect with regard to these areas.<sup>12</sup> Alaska Communications Internet will operate the proposed earth stations in compliance with *C-band Report and Order* by limiting its operations in the 3.7-4.2 GHz band to locations outside of the contiguous United States at all times.<sup>13</sup> In removing the FSS allocation in the 3.7-4.0 GHz band within the contiguous United States, the Commission noted that “locations outside of the

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<sup>12</sup> *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, GN Docket No. 18-122, Report and Order and Order of Proposed Modification, FCC 20-22, 35 FCC Rcd 2343 (2020), at ¶ 149 (“*C-band Order*”), *appeals pending* (“*C-Band Report and Order*”).

<sup>13</sup> *See C-Band Report and Order* ¶ 132 (finding that, “authorizations for FSS operations outside of the contiguous United States may continue to operate in the entire 3.7-4.2 GHz band”).

contiguous United States, many of which are remote, have a greater need for a wide variety of C-band services”<sup>14</sup> and thus maintained the FSS allocation in those regions. In most instances, the C-band services provided by Alaska Communications Internet is the only option available for these remote Alaska Bush villages and businesses and the type of critical C-band services contemplated by the Commission. Accordingly, no waiver of the Commission’s rules is required.

#### **E. Public Interest**

Grant of this application will strongly serve the public interest by furthering the goals of Commission to expand the availability of affordable broadband services and thereby provide enhanced economic growth and development opportunities for residents of the Alaska Bush.<sup>15</sup> In general, the earth stations proposed in this Application represent another step toward fulfilling the Commission’s vision of universal availability of broadband. As the Commission reiterated in late 2019:

Broadband access is critical to economic opportunity, job creation, education and civic engagement. That is why closing the digital divide is the Commission’s top priority. For communities throughout our nation to thrive and prosper, their residents must have the option to obtain high-speed Internet access.<sup>16</sup>

By improving educational and economic opportunities and healthcare services, supporting civic involvement, and strengthening the cultural and social fabric of the nation, these earth stations will help close the digital divide and enhance the wellbeing of the communities they serve.

Specifically, grant of this application will strongly serve the public interest by allowing Alaska Communications Internet to provide reliable broadband services to support its customers

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<sup>14</sup> *Id.*

<sup>15</sup> See *generally Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17663 (2011) (“*Transformation Order*”).

<sup>16</sup> *Rural Digital Opportunity Fund*, WC Docket No. 19-126, Notice of Proposed Rulemaking, FCC 19-77 (rel. Aug. 2, 2019), at ¶ 1.

with new and updated sites throughout the state of Alaska. At the new Kotlik School site, for example, the connectivity Alaska Communications Internet will provide will support the school and its teachers in fostering the growth and education of Alaskan children, where children from pre-kindergarten to twelfth grade are in attendance. As another example, providing Trident False Pass facility will support operations, management and personnel, managing logistics, coordinating shipments, and keep employees connected with their families. Finally, grant of this modification application request will allow Alaska Communications Internet to further expand its network and improve operational flexibility, create an improved additional competitive alternative for Alaskan businesses with little access to telecommunications connectivity, and help improve the competitive landscape in Alaska.

For all Sites proposed hereunder, because remote areas of Alaska are unique in their need for C-band satellite broadband connectivity and will occur exclusively outside of the contiguous United State, it will best serve the public interest to authorize additional earth stations in the Alaska Bush forthwith.

## **II. Conclusion**

For the foregoing reasons, Alaska Communications Internet requests that the Commission grant this Application to modify the License, E170205, to add three (3) Additional Sites and update the fourteen (14) Modified Sites, as described herein, to its existing C-band VSAT network.