

REQUEST FOR WAIVER

By this application (the “Application”), Denali Media Anchorage, Corp. (“DMA”) is, to the extent necessary, seeking a waiver of the Federal Communications Commission (“FCC” or “Commission”) requirement that applications for renewals of earth station licenses be submitted “no later than 30 days before the expiration date of the license” pursuant to 47 C.F.R. §25.121(e), for the satellite earth station identified by call sign E060015 (referred to herein as the “License”). The expiration of the License is March 3, 2021. By this filing, and for good cause shown, DMA seeks a waiver of the filing window deadline due to an internal administrative error that resulted in DMA not timely filing the renewal application.

The DMA employee responsible for making the filing inadvertently missed the 30-day filing date, which occurred on February 1, 2021. Once this was known, the employee took immediate steps to initiate the renewal application and this waiver request. Furthermore, the company is currently exploring and implementing additional procedures to help avoid such administrative errors in the future.

Generally, the Commission may waive any rule for good cause shown.¹ Section 1.925 of the FCC rules empowers the Commission to waive specific requirements of the rules upon request if (a) the underlying purpose of the rule would not be served or would be frustrated by the application of the rule, and a waiver would serve the public interest; or (b) unique or unusual circumstances are presented such that it would be inequitable, unduly burdensome or contrary to the public interest to enforce the rule, and the applicant has no reasonable alternative.²

¹ 47 C.F.R. § 1.3.

² 47 C.F.R. §1.925(b)(3).

The purpose of the Commission's renewal rules is to encourage the provision of service to customers and to prevent carriers from warehousing unused resources. The substantial public service record of DMA (through its parent entity GCI) indicates that the company is committed to providing service to consumers in Alaska.

Failing to grant the requested waiver of the filing window would actually undermine the purposes of the Commission's renewal rules, as it would hinder DMA's ability to serve Alaska residents. A waiver of the renewal application deadline in this instance will permit DMA to continue to offer important services to the public over the License. Accordingly the purpose of the Commission's renewal rules will not be undermined, but in fact promoted by a grant of the waiver.

DMA also has no reasonable alternative to seeking this waiver, as the February 1, 2021 filing date for the License has already passed. This Application demonstrates that the public interest would be served by a grant of the requested waiver. Accordingly, for good cause shown, DMA requests a waiver of the requirement that applications for renewals of earth station licenses be submitted "no later than 30 days before the expiration date of the license" pursuant to 47 C.F.R. §25.121(e), consistent with the request for relief set forth herein, and any other such relief as the Commission may deem proper.