Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Application of Alaska Communications Internet LLC for 60-Day Special Temporary Authorization ("STA") to Operate a Network of Earth Stations Operating in Portions of the 3700-4200 MHz and 5925-6425 MHz Bands	)))))	Call Sign: File No.

APPLICATION FOR SPECIAL TEMPORARY AUTHORIZATION

Pursuant to Section 25.120 of the rules of the Federal Communications Commission (the "FCC" or "Commission"), 47 C.F.R. § 25.120, Alaska Communications Internet LLC ("Alaska Communications Internet") respectfully seeks 60-day special temporary authorization ("STA") commencing on Thursday, September 28, 2017, to operate a small network of two (2) very small aperture terminals ("VSATs") and an associated hub earth station in portions of the 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space) bands (collectively, the "C-band") at fixed locations in Alaska while communicating with the Eutelsat 115WB satellite located at the 114.9° W.L. orbital position. Alaska Communications Internet seeks this STA to permit near-term provisioning of critical broadband satellite communications services to these locations.[1]

Alaska Communications Internet anticipates filing an application for regular authority to operate a larger C-band VSAT network, licensed pursuant to Section 25.115(c)(2) of the Commission's rules, in the very near term. Grant of this STA request will serve the public interest because it will allow Alaska Communications Internet to ensure uninterrupted broadband communications services to Alaska Native and other remote communities and businesses in the Alaska Bush[2] that lack terrestrial broadband service while that application is considered by the FCC.

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1 47 C.F.R. § 25.115(c)(2).

2 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

I. Background

Alaska Communications Internet is an affiliate of Alaska Communications Systems Group, Inc. ("Alaska Communications"), a publicly-traded company that provides terrestrial wireline telecommunications and broadband-enabled services throughout Alaska as the largest incumbent local exchange carrier in the state.[3] Alaska Communications Internet provides essential broadband and voice-over-Internet Protocol ("VoIP") services to enterprise, business, educational, health care, and residential customers throughout the state.

This STA, and the forthcoming C-band VSAT network license application, are required to enable provisioning of broadband satellite services to users in remote locations, where traditional communication services are generally unavailable. Specifically, with this STA, Alaska Communications Internet seeks to support the Tanadgusix Corporation ("TDX"), an Alaska Native corporation created pursuant to the Alaska Native Claims Settlement Act ("ANCSA"). In doing so, Alaska Communications Internet will initiate improved and innovative broadband communication services to the primarily Alaska Native population of St. Paul Island. At roughly 40 square miles, St. Paul Island is the largest of the Pribilof Islands, is located in the Bering Sea some 300 miles west of Alaska's mainland, and is one of the most remote locations in the nation. As discussed below, this STA is necessary to ensure the uninterrupted delivery of

accessed by road, and are not 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.

[3] 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; and ACS Long Distance, LLC. *See also* ACS Systems, Inc., File No. ITC-214-19980112-00019 (International Section 214 authorization).

broadband services to St. Paul Island, following the expiration of TDX's former contract for satellite services.

In the attached draft FCC Form 312 Schedule B and Technical Appendix, Alaska Communications Internet provides relevant information relating to the proposed operations, including earth station operating parameters and performance information and radiation hazard analyses.[4] As discussed below, each of the proposed earth station antennae are on the Commission's Approved Non-Routine Earth Station Antennas List ("Non-Routine Antenna List")[5] and Alaska Communications Internet will operate the earth stations below the maximum EIRP spectral density ("ESD") levels previously approved by the Commission. Alaska Communications Internet acknowledges that this STA request is limited to the earth stations and locations identified in the application and it does not intend to bring additional earth stations into operation under this temporary authority.

II. Discussion

This STA request seeks authority to operate a network of three C-band earth station sites, as follows:

A. Site Locations and Operating Parameters

Under this STA, Alaska Communications Internet proposes to operate a single hub earth station and two VSAT remote terminals at previously coordinated locations. The hub earth station – the 3.8m Prodelin GD Satcom Series 1383 (the "3.8m hub") – will be located at the

[4] Alaska Communications Internet notes that the radiation hazard analyses include "worst case" calculations. Alaska Communications Internet expects ordinarily to operate the earth stations at power levels in accordance with those specified in the attached draft Form 312 Schedule B, which are well below the levels proposed in the reports.

[5] *See* Approved Non-Routine Earth Station Antennas, https://www.fcc.gov/approved-non-routine-earth-station-antennas.

Dimond D facility in Anchorage, Alaska (geographic coordinates: 61° 8' 28.4" N, 149° 52' 30.7" W), where it was previously authorized by the Commission for similar hub earth station operations.[6] The former owner, Futaris Inc., ceased operations at the Dimond D site, and surrendered its license to operate the facility early this year.[7] Alaska Communications Internet has now acquired the underlying equipment, but Futaris's earlier surrender of its license now necessitates this STA, which is crucial to ensure no lapse in vital satellite communication services to the remote population on St. Paul Island. Alaska Communications Internet intends to begin commercial service to St. Paul Island no later than September 28, 2017, in order to minimize the lapse in vital satellite communication services to this remote region.

The Prodelin 3.8m antenna is on the Commission's Non-Routine Antenna List and is authorized thereunder to operate at ESD levels substantially higher than those proposed in the attached draft FCC Form 312 Schedule B. The hub (and associated VSAT terminals) will be supported by transponder capacity on the Eutelsat 115WB satellite, a Permitted Space Station List satellite whose operational parameters are well known to the Commission.[8]

One of the remote sites, St. Paul Island, Alaska (geographic coordinates: 57° 9' 35.99"N, 170° 13' 11.99"W) (the "3.8m remote"), will utilize an identical 3.8m Prodelin antenna to the 3.8m antenna located at the Dimond D hub. There, it will provide satellite connectivity to residents and businesses, improving the economic opportunities for the island population.

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6 Futaris, Inc., File No. SES-LIC-20151117-00847, Call Sign E150139 (granting authority to operate the 3.8m Hub to support fixed C-band operations in Alaska).

7 *See* Futaris, Inc., File No. SES-LIC-20151117-00847, Call Sign E150139, Surrender of Authorization Letter (filed on March 31, 2017).

8 *See* Satélites Mexicanos, S.A. de C.V., File No. SAT-PPL-20150227-00008 (Call Sign S2938).

The second remote site will be located at the Alaska Communications headquarters (geographic coordinates: 61°11'10.50"N, 149°52'15.57"W) less than five miles from the 3.8m hub. That site will use a 2.4m Prodelin Model 1244 (the "2.4m remote"), an antenna that has been previously authorized for similar C-band operations and is on the Commission's Non-Routine Antenna List.[9] That site will be used to provide operational support and for testing purposes.

Although these antennae do not comply with the gain mask in Section 25.209 of the Commission's rules, Alaska Communications Internet demonstrates in the attached draft FCC Form 312 Schedule B that it will operate the terminals at maximum ESD levels below those previously approved by the Commission. Moreover, Alaska Communications Internet will operate the earth stations in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules[10] and will otherwise operate under this STA consistent with the Commission's rules governing C-band earth station networks,[11] including limiting its earth station operations to a maximum of 20 MHz of spectrum in each direction at Eutelsat 115WB.

B. Frequency Coordination

Alaska Communications Internet has engaged Micronet Communications, Inc. ("Micronet") to perform frequency coordination work in support of its application for a full FCC license for its planned C-band Earth station network. In the course of that work, Micronet has reviewed both the fixed microwave database and the Earth station operating parameters proposed

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9 *Supra* n.5; *see, e.g.*, Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075.

10 *See* 47 C.F.R. § 25.218(d).

11 *See* 47 C.F.R. § 25.115(c)(2). In its C-band VSAT network license application, Alaska Communications Internet intends to seek a waiver of Section 25.115(c)(2)(i)(B) of the Commission's rules to permit full use of its assigned transponder on Eutelsat 115WB.

by Alaska Communications Internet in this STA request for each location (Dimond D, St. Paul Island, and the Anchorage headquarters), as fully described in the attached draft FCC Form 312 Schedule B. Micronet's review has revealed no potential for the STA operations proposed herein to cause harmful interference to other users of the C-band spectrum and, thus, that Alaska Communications Internet's limited C-band operations are fully compatible with other FCC-licensed operations in these frequencies.

Still, Alaska Communications Internet agrees to operate on an unprotected and non-interference basis during the term of this STA and will immediately terminate its VSAT operations upon notification that its temporary operations are causing harmful interference to existing licensees. For the underlying C-band VSAT commercial application, Alaska Communications Internet is working with Micronet to prepare coordination reports for each location identified herein to allow for full use of the Eutelsat 115WB transponder.

III. STA Request & Public Interest Considerations

Section 25.120(a) provides that an STA request should be filed at least three business days prior to commence of proposed operations. Here, Alaska Communications Internet has timely filed this 60-day STA request so that the Commission may permit operations by September 28, 2017. Moreover, Section 25.120(b)(2) states that the Commission may grant a temporary authorization for up to 60 days if the STA request has not been placed on public notice and the applicant plans to file a request for regular authority for the service. As noted, Alaska Communications Internet anticipates filing its application for a C-band network license for the operations proposed herein within the next 60 days. This interim authority during the pendency of Alaska Communications Internet's commercial license application is critical to

ensure delivery of satellite services to the population of St. Paul Island, Alaska, which is unable to rely on other forms of communication for basic connectivity needs.

Grant of the requested 60-day STA will strongly serve the public interest by allowing Alaska Communications Internet to ensure uninterrupted broadband services to remote Alaskan communities that rely on these services for basic connectivity needs. Grant of the STA will allow Alaska Communications Internet to serve underserved Aleut communities in St. Paul Island, and help improve the local economy and well-being of its residents, helping to bridge the digital divide. This service will enable users to have broadband Internet access, e-mail, voice and data services, greatly enhancing economic opportunities in these remote locations.

IV. Conclusion

Based on the foregoing, the public interest would be served by a Commission grant to Alaska Communications Internet to operate a small network of C-band VSAT earth stations for a period of 60 days to serve remote Alaskan communities commencing on September 28, 2017, or as soon as practicable thereafter.