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September 28, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Alaska Communications Internet LLC – Section 1.65 Submission  
Updated Earth Station Power Level Information for 60-Day STA Request  
File No. SES-STA-20170925-01054**

Dear Ms. Dortch:

After consultation with the Commission staff, Alaska Communications Internet LLC (“Alaska Communications Internet”), pursuant to Section 1.65 of the Commission’s Rules, 47 C.F.R. § 1.65, seeks to update certain power level information submitted in connection with the above-referenced request for 60-day special temporary authorization (“STA”) to operate a C-band very small aperture terminal (“VSAT”) network in Alaska.

Specifically, Alaska Communications Internet updates the EIRP spectral density (“ESD”) and ESD towards the horizon values in the draft FCC Form 312 Schedule B as follows:

<u>Earth Station</u>	<u>Max. ESD (Item E49)</u>	<u>Max. ESD Towards the Horizon (Item E60)</u>	<u>Max. Transmit Power</u>
3.8m (Dimond D)	25.56 dBW/4 kHz	-20.48 dBW/4 kHz	360 W
3.8m (St. Paul Island)	6.999 dBW/4 kHz	-34.07 dBW/4 kHz	5 W
2.4m (Anchorage HQ)	13.01 dBW/4 kHz	-29.04 dBW/4 kHz	20 W

These maximum ESD levels remain well below the levels previously authorized for these antennae on the Commission’s Approved Non-Routine Earth Station Antenna List,<sup>1</sup> and apply irrespective of the specific carrier bandwidth used.<sup>2</sup> Moreover, the maximum transmit power represent “worst case” transmit levels and Alaska Communications Internet expects to ordinarily operate the earth stations at power levels well below those identified above.

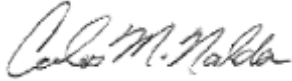
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<sup>1</sup> See, e.g., RCN License Subsidiary, Inc., File No. SES-LIC-20050517-00611, Call Sign E050142 (permitting a maximum ESD of 35.9 dBW/4 kHz for the 3.8m earth station); Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075 (permitting a maximum ESD of 30.0 dBW/4 kHz for the 2.4m earth station).

<sup>2</sup> Uniform spectral density is maintained by varying the maximum EIRP per carrier.

Please do not hesitate to contact me with any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carlos M. Nalda". The signature is fluid and cursive, written in a professional style.

Carlos M. Nalda  
Principal  
LMI Advisors

cc (w/ att.):     Jose Trevino  
                  Trang Nguyen  
                  Kerry Murray