



Page \_\_\_\_\_ of \_\_\_\_\_

John Doe

(if other than name)

Call Sign \_\_\_\_\_ Grant Date \_\_\_\_\_

File # \_\_\_\_\_

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:  
60-Day STA Request for Fixed Earth Station Operations

1. Applicant

<b>Name:</b>	Alaska Communications Internet, LLC	<b>Phone Number:</b>	907-297-3000
<b>DBA Name:</b>		<b>Fax Number:</b>	907-297-3153
<b>Street:</b>	600 Telephone Avenue MS #60	<b>E-Mail:</b>	Lisa.Phillips@acsalaska.com
<b>City:</b>	Anchorage	<b>State:</b>	AK
<b>Country:</b>	USA	<b>Zipcode:</b>	90503 -
<b>Attention:</b>	Ms. Lisa Phillips		



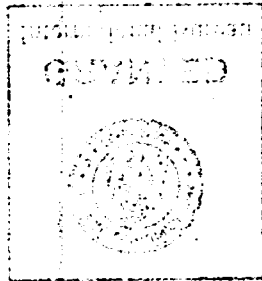
60 days "with conditions"

File # SES-STA-20170925-01054

Call Sign N/A Grant Date 09/28/2017  
(or other identifier)

Term Dates  
From: 09/28/2017 To: 11/27/2017

Approved: Key Munn  
Deputy Chief, Satellite Div.



Address: \_\_\_\_\_  
From: \_\_\_\_\_ To: \_\_\_\_\_  
ICM Date  
(or other identification)  
Call Sign \_\_\_\_\_ Class Date \_\_\_\_\_  
Lic # \_\_\_\_\_

Applicant: Alaska Communications Internet, LLC  
File No.: SES-STA-20170925-01054  
Call Sign: None  
Special Temporary Authority

Alaska Communications Internet, LLC, is granted a special temporary authority, for 60 days, beginning on September 28, 2017, to operate a small network of two (3.8 meter antennas) very small aperture terminals ("VSATs") and an associated hub earth station (2.4 meter antenna) at Anchorage, Alaska and at St. Paul Island, Alaska to permit near-term provisioning of critical broadband satellite communications services to these locations, using the following frequency bands: 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space) to communication with Eutelsat 115WB satellite at 114.9° W.L, under the following conditions:

1. Operations under this authority are on a non-interference basis only.
2. Operations under this authority are on a non-protected basis only.
3. In the event of any harmful interference under this grant of special temporary authority, Alaska Communications Internet, LLC, must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
4. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely 'at Alaska Communications Internet, LLC's risk.
5. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future Alaska Communications Internet, LLC's applications..
6. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Alaska Communications Internet, LLC's risk.
7. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective immediately.



File # SES-STA-20170925-01054

Call Sign N/A Grant Date 09/28/2017  
(or other identifier)

Term Dates  
From: 09/28/2017 To: 11/27/2017

Approved:

*Ken Murray*  
Deputy Chief, Satellite Div

"with conditions"

**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.<sup>1</sup>

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<sup>2</sup> that lack terrestrial broadband service while that application is considered by the FCC.

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<sup>1</sup> 47 C.F.R. § 25.115(c)(2).

<sup>2</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

## 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.<sup>3</sup> 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

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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.

<sup>3</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; 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.<sup>4</sup> 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")<sup>5</sup> 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

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<sup>4</sup> 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.

<sup>5</sup> 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.<sup>6</sup> The former owner, Futaris Inc., ceased operations at the Dimond D site, and surrendered its license to operate the facility early this year.<sup>7</sup> 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.<sup>8</sup>

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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<sup>6</sup> 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).

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

<sup>8</sup> 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.<sup>9</sup> 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<sup>10</sup> and will otherwise operate under this STA consistent with the Commission's rules governing C-band earth station networks,<sup>11</sup> 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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<sup>9</sup> *Supra* n.5; *see, e.g.*, Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075.

<sup>10</sup> *See* 47 C.F.R. § 25.218(d).

<sup>11</sup> *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.

**2. Contact**

<b>Name:</b>	Carlos Nalda	<b>Phone Number:</b>	5713325626
<b>Company:</b>	LMI Advisors	<b>Fax Number:</b>	
<b>Street:</b>	2550 M Street NW Suite 345	<b>E-Mail:</b>	cnalda@lmiadvisors.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20037 -
<b>Attention:</b>		<b>Relationship:</b>	Other

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number or Submission ID

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).  
 Governmental Entity     Noncommercial educational licensee  
 Other (please explain):

4b. Fee Classification    CGX – Fixed Satellite Transmit/Receive Earth Station

5. Type Request

- Use Prior to Grant                       Change Station Location                       Other

6. Requested Use Prior Date

09/28/2017

7. City Multiple Sites

8. Latitude

(dd mm ss.s h) 0 0 0.0

9. State	10. Longitude (dd mm ss.s h) 0 0 0.0
11. Please supply any need attachments. Attachment 1: Technical Appendix                      Attachment 2: Narrative                      Attachment 3:	
12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.) <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> ACS Internet respectfully seeks a 60-day STA to operate a small C-band VSAT network in Alaska. </div>	
13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes. <div style="text-align: right;"> <input checked="" type="radio"/> Yes                      <input type="radio"/> No </div>	
14. Name of Person Signing Rick Benken	15. Title of Person Signing VP
<b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).</b>	

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