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: E170205 File No. SES-STA-_____

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 January 20, 2018, 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 requests this STA to allow it to continue operations consistent with its current STA authority[1] until its commercial license application, which was placed on Public Notice on December 27, 2017,[2] is acted upon by the Commission.

Grant of this STA request will serve the public interest because it will allow Alaska Communications Internet to continue uninterrupted broadband communications services while the

[1] *See* Alaska Communications Internet LLC, File Nos. SES-STA-20170925-01054 (granted on September 28, 2017) and SES-STA-20171116-01258 (granted on November 21, 2017), Call Sign E170205 (together, the "*VSAT Network STA*").

[2] *See* Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign E170205 ("*VSAT Network License Application*"); Public Notice, "Satellite Radio Applications Accepted for Filing," Rept. No. SES-02021 (rel. Dec. 27, 2017).

Public Notice period for the company's commercial license continues to run. It will thus ensure continued connectivity to Alaska Native and other remote communities and businesses in the Alaska Bush[3] that lack terrestrial broadband service while the *VSAT Network License Application* is considered by the Commission.

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.[4] 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 recently-filed *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 continue supporting the Tanadgusix Corporation ("TDX"), an Alaska Native corporation created pursuant to the Alaska Native Claims Settlement Act

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[3] 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, 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.

[4] 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).

("ANCSA"), as it has been doing under the previous *VSAT Network STA*. In doing so, Alaska Communications Internet will continue to deliver the improved and innovative broadband communication services it currently provides 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. It 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 broadband services to St. Paul Island, following the upcoming expiration of Alaska Communications Internet's existing STA authority, which will occur before the end of the Public Notice period for its *VSAT Network License Application*. Moreover, a start date of January 20, 2018 is imperative to ensure Alaska Communications Internet can continue to operate after the expiration on that date of its current *VSAT Network STA* and in accordance with the updated earth station operating parameters stated in the *VSAT Network License Application*. Alaska Communications Internet will continue to adhere to the conditions imposed by the Commission in its previous STA grants.[5] Moreover, Alaska Communications Internet incorporates by reference the additional information provided in support of its *VSAT Network License Application*.[6]

In the attached as-filed FCC Form 312 Schedule B and Technical Appendix, which were also included in the *VSAT Network License Application,* Alaska Communications Internet

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5 *Supra* n.1.

6 *See* Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign E170205, *Section 1.65 Letter Regarding Application for C-Band Very Small Aperture Terminal ("VSAT") Blanket License.*

provides relevant information relating to the proposed operations, including earth station operating parameters and performance information and radiation hazard analyses. 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")[7] and Alaska Communications Internet will operate the earth stations below the maximum EIRP spectral density ("ESD") levels previously approved by the Commission.

II. Discussion

This STA request authority to operate a C-band VSAT network consisting of a single hub earth station and two VSAT remote terminals at previously coordinated locations.

A. Site Locations and Operating Parameters

Under this STA, Alaska Communications Internet proposes to continue 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") – is located at the 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.[8] The former owner, Futaris Inc., ceased operations at the Dimond D site, and

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[7] *See* Approved Non-Routine Earth Station Antennas, https://www.fcc.gov/approved-non-routine-earth-station-antennas. Regarding the Prodelin Model 1244, *see* Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075; Intelsat LLC, File No. SES-LIC-20091027-01364, Call Sign E090186; Globe Wireless LLC, File No. SES-LIC-20120116-00058, Call Sign E120017. Regarding the Prodelin Model 1383, *see* RCN License Subsidiary, Inc., File No. SES-LIC-20050114-00077, Call Sign E050016; RCN License Subsidiary, Inc., File No. SES-LIC-20050517-00611, Call Sign E050142; Public Broadcasting of Colorado, Inc., File No. SES-MOD-20060608-00951, Call Sign E030163; New Life Evangelistic Center Inc., File No. SES-LIC-20080427-00495, Call Sign E0800.

[8] 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).

surrendered its license to operate the facility early this year.[9] Alaska Communications Internet seeks to continue commercial service to St. Paul Island, in order to avoid a 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 as-filed FCC Form 312 Schedule B. The hub (and associated VSAT terminals) is supported by transponder capacity on the Eutelsat 115WB satellite, a Permitted Space Station List satellite whose operational parameters are well known to the Commission.[10]

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 continue to provide satellite connectivity to residents and businesses, improving the economic opportunities for the island population.

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.[11] That site is 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, 47 C.F.R. § 25.209, Alaska Communications Internet demonstrates in the

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

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

11 *Supra* n.7; *see, e.g.*, Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075.

attached as-filed 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 continue to operate the earth stations in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules, 47 C.F.R. § 25.218(d).

B. Frequency Coordination

Alaska Communications Internet engaged Micronet Communications, Inc. ("Micronet") to perform frequency coordination in support of the underlying *VSAT Network License Application*, which is also provided as part of this STA request. 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 on behalf of Alaska Communications Internet and provided Prior Coordination Notices ("PCNs") to all existing, proposed and prior coordinated microwave facilities within the contours of each proposed earth station at the locations identified herein.

As demonstrated in the attached frequency coordination reports, the proposed operations have been coordinated and limited as necessary and there is no potential for interference into other users of the C-band spectrum sought herein by Alaska Communications Internet. At the Dimond D hub and St. Paul Island remote site, Alaska Communications Internet's proposed operations in the 3704-3776 MHz (space-to-Earth) and 5929-6001 MHz (Earth-to-space) bands are fully compatible with other FCC-licensed operations in the band.[12] At the Anchorage remote site, Alaska Communications Internet will receive in the 3704-3776 MHz band (space-to-Earth)

[12] When transmitting from the Dimond D hub using a 3 MHz carrier bandwidth, Alaska Internet Communications will limit its operations to the 5929-5944.85 MHz band (Earth-to-space) to avoid potential interference to adjacent incumbent microwave operations.

and limit its transmit operations at all times to the 5929-5944.85 MHz band (Earth-to-space) to prevent interference to a nearby microwave site that is operating at 5974.85 MHz.[13]

Such spectrum limitations facilitated Alaska Communications Internet's waiver request in the *VSAT Network License Application* to permit use of the full 72 MHz transponder on EUTELSAT 115WB. Alaska Communications Internet requested the waiver to ensure it has the long-term operational flexibility and capacity to serve these remote Alaska communities, however, the waiver is not required nor requested in the instant STA request and Alaska Communications Internet will operate fully consistent with the parameters in the frequency coordination reports and the parameters for the hub and two remote sites specified in the Form 312 Schedule B associated with the *VSAT Network License Application*.

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 January 20, 2018. Moreover, Section 25.120(b)(3) 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 if a request for regulatory authority will be filed by the applicant. As noted, Alaska Communications Internet has already filed an application for a C-band network license for the operations proposed herein. 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

[13] Alaska Communications Internet reserves the right to modify its license to transmit in the entire 5929-6001 MHz band upon successful coordination with incumbent spectrum users.

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 continue serving 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, Alaska Communications Internet requests that the Commission grant Special Temporary Authority, as requested herein, to permit it to continue operation of a small network of C-band VSAT earth stations for a period of 60 days to serve remote Alaskan communities, commencing on January 20, 2018, or as soon as practicable thereafter.