

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

Application of Alaska Communications	)	
Internet LLC for 60-Day Special Temporary	)	Call Sign: E170205
Authorization to Operate New C-Band Very	)	
Small Aperture Terminal Remote Sites	)	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 Friday, May 4, 2018, to operate two (2) remote earth station sites as part of its existing C-band very small aperture terminal (“VSAT”) network<sup>1</sup> during the pendency of its underlying modification application for long-term operating authority.<sup>2</sup> Consistent with the *ACI Network License*, Alaska Communications Internet seeks to operate these new sites in the 3704-3776 MHz (space-to-Earth) and 5929-6001 MHz (Earth-to-space) bands at fixed locations in Alaska while communicating with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position. Grant of this STA request will serve the public interest because it will allow Alaska Communications Internet to provide immediate broadband connectivity to local businesses in the Alaska Bush<sup>3</sup> that are unable to rely on terrestrial services, thereby providing improved economic growth and development opportunities in the area.

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<sup>1</sup> See Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign 170205 (“*ACI Network License*”).

<sup>2</sup> See Alaska Communications Internet LLC, File Nos. SES-MOD-20180413-00352 and SES-AMD-INTR2018-01103, Call Sign 170205 (“*ACI Modification Application*”).

<sup>3</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>4</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.

The *ACI Network License* currently authorizes Alaska Communications Internet to operate a network of C-band satellite earth stations, in order to provide satellite services to users in remote locations. Currently, the network serves locations that encompass the Alaska Native population of St. Paul Island and the Tanadgusix Corporation (“TDX”), an Alaska Native corporation created pursuant to the Alaska Native Claims Settlement Act (“ANCSA”). Alaska Communications Internet seeks to expand operations under the *ACI Network License* to bring the benefits of satellite broadband connectivity to more communities and businesses in remote areas of Alaska.

Alaska Communications Internet acknowledges the Commission’s Public Notice placing a temporary freeze on the filing of all new or modification applications for earth stations in the 3.7-

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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>4</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).

4.2 GHz band, effective as of April 19, 2018.<sup>5</sup> The *Temporary Freeze Public Notice* does not include a freeze on STA requests and thus the instant request is outside the scope of the freeze.

## II. Discussion

In this STA request, and in the underlying *ACI Modification Application*, Alaska Communications Internet seeks to incorporate additional earth station sites that will support local businesses co-owned by the Bristol Bay Economic Development Corporation (“BBEDC”). The BBEDC is a not-for-profit company whose mission is to promote economic growth and opportunities for residents of BBEDC’s member communities through sustainable use of the Bering Sea resources.<sup>6</sup> The earth stations themselves will be located on previously erected poles near commercial sites and will provide broadband connectivity that will support the local fishing and seafood industries and related economic development.

Alaska Communications Internet incorporates by reference the FCC Form 312 Schedule B and Technical Appendix provided with the *ACI Modification Application* (and associated amendment), which includes relevant information relating to the earth station operating parameters, performance information, and radiation hazard analyses. At each site, Alaska Communications Internet will operate a 2.4m Prodelin Model 1244 (the “2.4m”), an earth station that is currently authorized in the *ACI Network License* and on the Commission’s Approved Non-

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<sup>5</sup> See Public Notice, *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band, 90-Day Window to File Applications for Earth Stations Currently Operating in the 3.7-4.2 GHz Band*, DA 18-398 (rel. on April 19, 2018) (“*Temporary Freeze Public Notice*”).

<sup>6</sup> See <http://www.bbedc.com>.

Routine Earth Station Antennas List (“Non-Routine Antenna List”),<sup>7</sup> at or below the power levels currently authorized by the Commission.

The continued, full use of the EUTELSAT 115WB transponder (*i.e.*, 72 MHz each for uplink and downlink) is consistent with the *ACI Network License* and will ensure Alaska Communications Internet has the operational flexibility and capacity to provide reliable connectivity to these local Alaskan Bush businesses.<sup>8</sup>

#### **A. New Site Locations**

This STA request seeks authority to operate two previously coordinated earth stations with the EUTELSAT 115WB satellite in the 3704-3776 MHz (space-to-Earth) and 5929-6001 MHz (Earth-to-space) bands at the following two (2) sites:<sup>9</sup>

- Alitak (geographic coordinates: 56° 53' 52.2" N, 154° 14' 43.0" W); and
- Naknek (geographic coordinates: 58° 43' 43.7" N, 157° 00' 0.90" W).

Each site will use the identical 2.4m VSAT earth station that is authorized in the *ACI Network License* for similar fixed C-band operations. Although the 2.4m earth station does not comply with the gain mask in Section 25.209 of the Commission’s rules, Alaska Communications Internet demonstrates in the FCC Form 312 Schedule B that it will operate the terminals at maximum ESD

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<sup>7</sup> See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>.

<sup>8</sup> Alaska Communications Internet understands that full use of the 72 MHz transponder frequency range is appropriate here pursuant to the existing terms of the *ACI Network License* (the 20 MHz limitation of Section 25.115(c)(2)(i)(B) of the Commission’s rules notwithstanding, 47 C.F.R. § 25.115(c)(2)(i)(B)). See *FWCC Request for Declaratory Ruling on Partial-Band Licensing of Earth Stations in the Fixed-Satellite Service That Share Terrestrial Spectrum*, Report and Order, FCC 01-177, RM-9649 (2001), ¶ 13. To the extent that any additional explicit Commission authority is necessary, Alaska Communications Internet so requests it.

<sup>9</sup> Alaska Communications Internet currently holds separate 60-day STA to operate a remote earth station site at Excursion Inlet. See File No. SES-STA-20180413-00353 (granted on April 19, 2018). All three sites are included in the *ACI Modification Application*.

levels below those authorized in the *ACI Network License* and 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).

At each site, the earth station will be mounted on a pre-existing structure, a pole approximately ten feet in height, located in a disturbed area adjacent to a seafood processing facility. Their planned locations are not among any "districts, sites, buildings, structures or objects, significant in American history, architecture, archeology, engineering or culture, that are listed, or are eligible for listing, in the National Register of Historic Places,"<sup>10</sup> and thus they fall within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.<sup>11</sup> Accordingly, no environmental assessment is required as part of this application because each proposed site is categorically exempt under Section 1.1306 of the Commission's rules, 47 C.F.R. § 1.1306.

## **B. Frequency Coordination**

Alaska Communications Internet engaged Micronet Communications, Inc. ("Micronet") to perform frequency coordination in support of the *ACI Modification Application*, which was completed on April 13, 2018. 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 that considers all existing, proposed, and prior coordinated microwave facilities within the contours of the proposed earth stations at the Alitak and Naknek facilities.

As demonstrated in the *ACI Modification Application* frequency coordination reports, there is no potential for interference with other users of the C-band spectrum and the operations proposed

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<sup>10</sup> 47 C.F.R. § 1.1307(a)(4).

<sup>11</sup> See 47 C.F.R. § 1.1306, Note 1 ("The provisions of § 1.1307(a) requiring the preparation of EAs do not encompass the mounting of antenna(s) and associated equipment (such as wiring, cabling, cabinets, or backup-power), on or in an existing building, or on an antenna tower or other man-made structure, unless § 1.1307(a)(4) is applicable.").

herein are fully compatible with other FCC-licensed operations. No objections have been received from incumbent licensees and Alaska Communications Internet currently operates its network with no reported cases of interference.

Pursuant to Commission rules, Alaska Communications Internet intends to commence long-term earth station operations at each new site immediately after the public notice of the *ACI Modification Application* is released, *see* 47 C.F.R. § 25.115(c)(2)(iv), but seeks this short-term STA to permit near-term provisioning of satellite services to help local Alaskan businesses realize the immediate benefits of improved broadband connectivity.

### **III. STA Request and Public Interest Considerations**

Section 25.120(a) provides that an STA request should be filed at least three business days prior to commencing proposed operations. Here, Alaska Communications Internet has timely filed this 60-day STA request so that the Commission may permit operations by May 4, 2018. 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 has concurrently filed the *ACI Modification Application* for the identical operations sought herein.

Grant of the requested 60-day STA will strongly serve the public interest by allowing Alaska Communications Internet to provide reliable broadband services to remote Alaskan businesses, helping to foster local economic growth, education, and employment opportunities. By directly supporting BBEDC businesses, Alaska Communication Internet is helping to enhance regional economy through revenues earned from investments in the ground fishing industry and promote fishery-related occupational programs and training for residents of the Bristol Bay region.

#### **IV. Conclusion**

Based on the foregoing, the public interest would be served by a grant of Commission authority to Alaska Communications Internet to operate two (2) additional earth station sites for a period of 60 days commencing on May 4, 2018, or as soon as practicable thereafter.