

**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 C-Band VSAT Network Earth Station Site)	Call Sign: E170205
)	
)	File No.: SES-STA-_____
)	
)	

REQUEST FOR SPECIAL TEMPORARY AUTHORIZATION EXTENSION

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 an extension of its 60-day special temporary authorization (“STA”), commencing on June 18, 2018, to operate an existing earth station site as part of its authorized C-band very small aperture terminal (“VSAT”) network.¹ Alaska Communications Internet requests this STA to allow it to continue operations consistent with its existing 60-day temporary authority² until its pending commercial license modification application, which was placed on Public Notice on May 23, 2018,³ is granted by the Commission. Alaska Communications Internet anticipates to operate under this temporary authority, which is identical to the existing *VSAT Network STA*, until the grant of the *VSAT License Modification Application*.

Alaska Communications Internet seeks to continue to operate a fixed site at Excursion Inlet, Alaska in the 3704-3776 MHz (space-to-Earth) and 5929-6001 MHz (Earth-to-space) bands while communicating with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position.

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

² See Alaska Communications Internet LLC, File No. SES-STA-20180413-00353 (granted on April 19, 2018) Call Sign E170205 (“*VSAT Network STA*”).

³ See Alaska Communications Internet LLC, File Nos. SES-MOD-20180413-00352 & SES-AMD-20180427-00401, Call Sign 170205 (“*VSAT License Modification Application*”).

Grant of this 60-day STA will serve the public interest because it will allow Alaska Communications Internet to ensure uninterrupted broadband communications services to local businesses, promoting economic growth and vocational opportunities for residents of the Alaskan Bush.⁴

I. Background

Alaska Communications Internet is an affiliate of Alaska Communications Systems Group, Inc. (“Alaska Communications”), a publicly-traded company that, through its subsidiaries, provides terrestrial wireline telecommunications and broadband-enabled services throughout Alaska as the largest incumbent local exchange carrier in the state.⁵ 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 *VSAT Network License* and *VSAT Network STA* presently allow 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 commercial 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

⁴ 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.

⁵ 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).

Act (“ANCSA”). Moreover, the *VSAT Network STA* currently supports 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.⁶ The earth station itself is located on an existing pole in an “antenna farm” area adjacent to other antennae and near a commercial site, and provides broadband connectivity supporting the local fishing and seafood industries, helping to improve economic opportunities for these Bristol Bay businesses and their surrounding communities.

In the interest of administrative convenience, Alaska Communications Internet incorporates by reference the Technical Appendix and FCC Form 312 Schedule B provided as part of the *VSAT Network Modification Application*, including the updated earth station operating parameters provided in the amendment filing.⁷ At the Excursion Inlet site, Alaska Communications Internet will operate a 2.4m Prodelin Model 1244 (the “2.4m”), an earth station that is currently licensed in the *VSAT Network License* and on the Commission’s Approved Non-Routine Earth Station Antennas List (“Non-Routine Antenna List”).⁸ At all times, Alaska Communications Internet will continue to the earth station below the maximum EIRP spectral

⁶ See <http://www.bbedc.com>.

⁷ See Alaska Communications Internet LLC, File No. SES-AMD-20180427-00401, Call Sign E170205.

⁸ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>; Letter to Marlene H. Dortch, “Alaska Communications Internet LLC – Section 1.65 Letter Regarding Application for C-Band Very Small Aperture Terminal (“VSAT”) Blanket License, File No. SES-LIC-20171116-01257, Call Sign 170205” (filed on Dec. 22, 2017) (*citing* 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).

density (“ESD”) levels authorized in the *VSAT Network License* and consistent with levels previously approved by the Commission.⁹

II. Discussion

This 60-day STA, with a start date of June 18, 2018, is necessary to ensure the uninterrupted delivery of broadband services to Excursion Inlet following the expiration of Alaska Communications Internet’s existing STA authority and prior to a grant of the *VSAT License Modification Application*.

The 2.4m VSAT remote terminal will communicate with the EUTELSAT 115WB satellite in the 3704-3776 MHz (space-to-Earth) and 5929-6001 MHz (Earth-to-space) bands. The continued, full use of the EUTELSAT 115WB transponder (*i.e.*, 72 MHz each for uplink and downlink) will ensure Alaska Communications Internet has the operational flexibility and capacity to provide reliable connectivity to this local Alaskan Bush business.¹⁰

As previously demonstrated by Alaska Communications Internet, full transponder use is imperative to be able to properly scale and offer the most reliable connectivity solutions to the remote communities of Alaska. Limiting operations with EUTELSAT 115WB to 20 MHz in each

⁹ The site will utilize an iDirect modem, which assigns individual time slots for the earth station’s transmissions, and thus there is no potential for aggregation of transmissions resulting in an exceedance of the off-axis ESD levels provided in this application.

¹⁰ Based on consultation with Commission staff, Alaska Communications Internet understands that Commission grant of this STA and underlying application will permit this site to use the full 72 MHz transponder frequency range authorized under the existing terms of the *VSAT 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 (“*CSAT Report & Order*”). To the extent that any additional explicit Commission authority is necessary, Alaska Communications Internet so requests it.

direction would greatly inhibit the promotion of broadband satellite services to rural United States, slowing the delivery of earth station services to rural Americans.

A. Excursion Inlet Site Location

Under this STA, Alaska Communications Internet seeks to continue to operate one additional site as part of its existing C-band VSAT network at Excursion Inlet, Alaska (geographic coordinates: 58° 24' 55.3" N, 135° 26' 36.4" W).

As noted, the site will use the identical 2.4m VSAT earth station that is authorized in the *VSAT Network License* for similar fixed C-band operations and is on the Commission's Non-Routine Antenna List.¹¹ 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 incorporated FCC Form 312 Schedule B that it will operate the terminals at maximum ESD levels below those currently authorized in the *VSAT Network License* and in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules.¹²

The earth station antenna is installed on an existing pole approximately ten feet in height, located in disturbed areas adjacent to a seafood processing facility and other satellite earth station antennae. Accordingly, no environmental assessment is required as part of this application because the proposed site is categorically exempt under Section 1.1306 of the Commission's rules. Specifically, the existing pole on which the earth station is mounted does not include 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

¹¹ *Supra* n.6; *see, e.g.*, Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075.

¹² *See* 47 C.F.R. § 25.218(d).

Places”),¹³ and thus falls within the “existing structure” exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.¹⁴ Furthermore, the earth station is located adjacent to other satellite dish antennae in an existing antenna farm. As such, it is also categorically exempt under Section 1.1306 and Note 3 to that rule, concerning “antenna farms.”¹⁵

B. Frequency Coordination

Alaska Communications Internet engaged Micronet Communications, Inc. (“Micronet”) to perform frequency coordination in support of this STA request and underlying application. 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 station at Excursion Inlet.

As demonstrated in the incorporated frequency coordination reports, submitted with the *VSAT License Modification Application*, there is no potential for interference between other users of the C-band spectrum and the operations at the proposed site requested herein by Alaska Communications Internet. At the 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

¹³ 47 C.F.R. § 1.1307(a)(4).

¹⁴ *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.”).

¹⁵ *See id.*, Note 3 (“The construction of an antenna tower or supporting structure in an established ‘antenna farm’: (*i.e.*, an area in which similar antenna towers are clustered, whether or not such area has been officially designated as an antenna farm), will be categorically excluded unless one or more of the antennas to be mounted on the tower or structure are subject to the provisions of §1.1307(b) and the additional radiofrequency radiation from the antenna(s) on the new tower or structure would cause human exposure in excess of the applicable health and safety guidelines cited in §1.1307(b).”).

compatible with other FCC-licensed operations in the band. To this date, no objections have been received from incumbent licensees and Alaska Communications Internet currently operations with no reported cases of interference.

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 June 18, 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 a pending commercial modification application for the operations proposed herein, and this interim STA authority will facilitate the short-term delivery of satellite services to the BBEDC businesses prior to Commission action on the *VSAT License Modification Application*. Pursuant to Commission rules, Alaska Communications Internet understands that this timely filed extension request will effectively extend its current temporary authority until the Commission acts on the *VSAT License Modification Application*, affording sufficient time for processing this request and enabling Alaska Communications Internet to continue to operate from the site.¹⁶

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 businesses, helping to foster local economic growth and educational and employment

¹⁶ See 47 C.F.R. §§ 25.120 & 25.163(b); Administrative Procedure Act § 9(b). See also 47 C.F.R. §1.955(b); *In the Matter of Marc D. Sobel Application for Consent to Assign the License for Conventional 800 MHz SMR Station KKT934, Montrose, California*, Memorandum Opinion & Order, FCC 05-90, ¶¶ 2 & 6.

opportunities for residents. Moreover, 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 a 60-day STA to Alaska Communications Internet to permit the continued operation of the Excursion Inlet earth station site as part of its C-band VSAT network, commencing on June 18, 2018, or until such time as its *VSAT License Modification Application* is granted.