

**GCI Communication Corp.  
Request for Extension of Special Temporary Authority**

**REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY**

By this application (the “Application”), GCI Communication Corp. (“GCI”) hereby requests an extension of its special temporary authority (“STA”) to continue to operate, for 60 days or less pending a decision on its application for regular authority,<sup>1</sup> a fixed earth station antenna in Chevak, AK, at 61° 31’ 47.8” N, 165° 34’ 51.1” W with the EUTELSAT 115 WB (SATMEX 7) (S2938) satellite at the 114.9° W.L. orbital location in the 3786-3858 MHz (space-to-Earth) and the 6011-6883 MHz (Earth-to-space) frequency bands.<sup>2</sup>

GCI initially sought an emergency STA pursuant to Section 25.120 of the Federal Communications Commission (the “FCC” or “Commission”) rules due to extraordinary circumstances. Specifically, GCI’s Askinuk Mountain tower was experiencing severe icing issues that has caused its microwave link, which services remote villages in western Alaska (Chevak and Hooper Bay), to become unreliable. This link is the primary link to communications in these villages, and provides not only mobile wireless voice and broadband services, but also supports telehealth services, school access services, wireless 911 routing, and serves as a backup to wireline 911 services. GCI took several efforts to remedy the situation, as described in the Chevak Initial STA Application, however because its services continued to be severely impacted, it sought an STA to utilize the C-band spectrum.<sup>3</sup> As explained, without a

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<sup>1</sup> See IBFS File No. SES-LIC-INTR2018-02449 (filed June 8, 2018).

<sup>2</sup> See IBFS File No. SES-STA-20180423-00391 (granted April 25, 2018) (“Chevak Initial STA Application”); IBFS File No. SES-STA-20180620-01772 (granted July 31, 2018); IBFS File No. SES-STA-20180914-02716 (granted Sept. 21, 2018); IBFS File No. SES-STA-20181119-03269 (granted November 30, 2018). The most recent STA extension expires on January 29, 2019.

<sup>3</sup> See Chevak Initial STA Application, Exhibit 1.

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grant of the requested temporary authority, remote residents in western Alaska may not have access to vital communications services, including accessing 911 services.<sup>4</sup>

Unfortunately, such extraordinary circumstance still exist today, and “delay in the institution of these temporary operations would seriously prejudice the public interest.”<sup>5</sup> Therefore, GCI is requesting an extension of its STA to continue to provide critical services to approximately 2300 western Alaskan residents over this license. As previously explained, many, if not most, of these affected residents rely solely on GCI’s services for a link to the world outside of their remote villages.<sup>6</sup> This is due in large part to the challenging nature of providing mobile service in Alaska. Such challenges include “its remoteness, lack of roads, challenges and costs associated with transporting fuel, lack of scalability per community, satellite and backhaul availability, extreme weather conditions, challenging topography, and short construction season.”<sup>7</sup> GCI relies on the C-Band band in order to provide its FSS operations, and has a very long history of providing C-band satellite communications solutions in Alaska in ways that advance the satellite technology space in an effort to provide communications services in rural Alaska. In addition, the substantial public service record of GCI indicates that the company is committed to providing service to consumers in Alaska. Indeed, as noted above, GCI has sought regular authority in order to avoid encountering a situation such as this next winter. Because

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<sup>4</sup> *Id.*

<sup>5</sup> 47 C.F.R. §25.120(b)(1).

<sup>6</sup> See Chevak Initial STA Application.

<sup>7</sup> *Connect America Fund; Universal Service Reform – Mobility Fund; Connect America Fund - Alaska Plan*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139, 10162, ¶ 72 (2016) (“*Alaska Plan R&O*”) (citing *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17829, ¶ 507 (2011) (“*USF/ICC Transformation Order*”), *aff’d sub nom. FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014)).

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GCI does not want service to its customers, including potential access to emergency services, to be implicated during the pendency of this request, it is requesting an extension of the STA.

Allowing a STA to permit GCI to continue to provide service over the C-Band, for an additional 60 days or less pending a decision on its application for regular authority, would certainly be in the public interest. This continued service illustrates a “compelling reason” to grant the requested STA extension.