

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

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

By this application (the “Application”), GCI Communication Corp. (“GCI”) hereby requests an extension of its special temporary authority (“STA”)¹ to continue to operate, for 60 days or less pending a decision on its application for regular authority,² a fixed satellite service (“FSS”) earth station in 3700-4200 MHz and 5925-6425 MHz.³ Specifically, GCI is seeking an extension of its temporary authorization to continue to provide service over the license identified by call sign E020336 (referred to herein as the “License”). Because GCI is requesting an STA for a period not to exceed 60 days pursuant to 47 C.F.R. §25.120(b)(3), this Application need not be placed on public notice and should be granted expeditiously pursuant to the rules. GCI’s operation of this Station would not cause harmful interference into surrounding networks, and as demonstrated below, there are extraordinary circumstances supporting the immediate grant of

¹ See IBFS File No. SES-STA-20181017-03063 (filed Nov. 27, 2018) (“Initial STA Request”).

² See IBFS File No. SES-LIC-20181017-03064. This application was accepted for filing on March 20, 2019. See *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Public Notice, Report No. SES-02145 (rel. Mar. 20, 2019).

³ GCI recognizes that the International, Public Safety and Homeland Security, and Wireless Telecommunications Bureaus (the “Bureaus”) announced a freeze effective April 19, 2018 “on the filing of new or modification applications for [FSS] earth station licenses, receive-only earth station registrations, and fixed microwave licenses in the 3.7-4.2 GHz frequency band.” Based on the text of the Public Notice, STA requests for FSS earth station licenses in the C-Band are not covered by the freeze. However, out of an abundance of caution, if the Bureaus were to determine that such an STA is considered a filing prohibited by this freeze, GCI respectfully requests a waiver of the freeze, as a grant of this STA request would “serve the public interest and not undermine the objectives of the freeze,” as detailed herein and further discussed in GCI’s request for waiver of this filing freeze in connection with its License application. See *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 3.7-4.2 GHz Band*, Public Notice, 1, 3, DA 18-398 (rel. Apr. 19, 2018).

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these temporary operations which is in the public interest and any delay in the institution of these temporary operations would seriously prejudice the public interest.

GCI initially sought a STA due to the untimely filing of its renewal application for the License. The GCI employee responsible for making the filing inadvertently missed the filing date. Once this was known, the employee took immediate steps to initiate a license application, which is currently pending, a waiver of the filing deadline and the Initial STA Request. Furthermore, GCI is currently adopting additional procedures to help avoid such administrative errors in the future.

Grant of this request for an extension of its STA is necessary for GCI to provide reliable communications services to GCI's customers and would serve the public interest. In this instance, GCI relies on the License to conduct significant testing to perform tasks critical to the engineering, operations and testing of satellite services carried in GCI's satellite networks over the License. An extension of the STA would allow GCI to continue to provide important service to the public as a result of the License. Here, "there are extraordinary circumstances requiring temporary operations in the public interest" and "delay in the institution of these temporary operations would seriously prejudice the public interest."⁴ The substantial public service record of GCI indicates that the company is committed to providing service to consumers in Alaska. Thus, allowing GCI to continue to provide service over the License, for 60 days (or less, pending the grant of GCI's accompanying license application), would certainly be in the public interest. This service illustrates a "compelling reason" to expeditiously grant the requested STA.

⁴ 47 C.F.R. §25.120(b)(1).

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This Application demonstrates that the public interest would be served by an extension of GCI's STA, of 60 days or less pending the grant of GCI's license application.