

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

In the Matter of

Application of Alaska Communications) Call Sign: E170205
Internet LLC for 60-Day Special Temporary)
Authorization (“STA”)) 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”),¹ Alaska Communications Internet LLC (“Alaska Communications Internet”) respectfully seeks a 60-day special temporary authorization (“STA”), commencing on Friday, May 17, 2019, to operate four (4) remote earth station sites as part of its existing C-band very small aperture terminal (“VSAT”) network² during the Commission’s review of its pending modification application.³ Consistent with the *ACI Network License*, Alaska Communications Internet seeks to operate these new sites in 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 seeks this STA to permit immediate provisioning of critical broadband satellite communications services to these locations while that *ACI Modification Application* is under the Commission’s consideration. Grant of this STA request will serve the public interest because it will enable Alaska Communications Internet to deliver

¹ See 47 C.F.R. § 25.120.

² See Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign E170205, and subsequent modification and amendment applications (“*ACI Network License*”).

³ See Alaska Communications Internet LLC, File No. SES-MOD-20180626-0142, Call Sign E170205 (“*ACI Modification Application*”). Alaska Communications Internet anticipates filing an application for regular authority to operate these sites as soon as the Commission completes action on the pending *ACI Modification Application*.

critically needed broadband services to support commercial operations in the Alaska Bush,⁴ both for Trident Seafood Corporation (“Trident”), the largest seafood company in the United States, at three coastal seafood processing plants (the “Trident Sites”), and for the operations of Pebble Limited Partnership (“Pebble”) in Iliamna, Alaska (the “Pebble Site”), to exploit a large porphyry deposit in southwest Alaska.

With employees and facilities sprawled across the Alaskan coastline, Trident needs reliable broadband services at the Trident Sites to support its operations, management and personnel, manage logistics, coordinate shipments and keep its employees connected to their families and the larger world. Pebble has a similarly urgent need for service at the Pebble Site, as it works to realize the Pebble Deposit’s potential to provide critical minerals to bolster America’s resource independence.

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.

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, nor are they 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; *see also* ACS Long Distance, Inc., File Nos. ITC-214-19960612-00248, ITC-T/C-20050822-00382, ITC-T/C-20040414-00190 (International Section 214 authorization).

The *ACI Network License* authorizes Alaska Communications Internet to operate a network of C-band satellite earth stations in order to provide satellite services to diverse users in remote locations in Alaska. Specifically, from the gateway hub in Anchorage, Alaska, the network currently serves 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”). In addition, the C-band VSAT network serves local businesses co-owned by the Bristol Bay Economic Development Corporation (“BBEDC”),⁶ providing broadband connectivity that supports the local fishing and seafood industries, as well as a test site located in Anchorage, Alaska. In the *ACI Modification Application*, Alaska Communications Internet has also sought authorization to extend its network to deliver broadband telecommunications and Internet access services to the Kuspuk School District’s nine primary and secondary schools, as well as the District Office, located in additional Alaska Bush communities.⁷ While that application remains pending, Alaska Communications Internet has obtained special temporary authority to serve those sites,⁸ as well as a seafood processing plant operated by Silver Bay Seafood, LLC at False Pass, Alaska.⁹ This STA is similar in scope to Alaska Communications Internet existing *Silver Bay STA* and will enable Alaska Communications Internet to extend broadband and internet connectivity to facilities across hundreds of miles of rugged Alaskan coastline, as well as to a remote interior site at Iliamna, Alaska.

⁶ 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. See <http://www.bbcdc.com/>.

⁷ See *ACI Modification Application*, *supra*, n.3.

⁸ See, e.g., Alaska Communications Internet LLC, SES-STA-20190130-00038 and SES-STA-20190408-00472, Call Sign E170205 (“*Kuspuk STA*”).

⁹ See Alaska Communications Internet LLC, File Nos. SES-STA-20190211-00110 and SES-STA-20190418-00526, Call Sign E170205 (“*Silver Bay STA*”).

Alaska Communications Internet incorporates by reference (and attaches as an Exhibit to this STA) a *pro forma* FCC Form 312 Schedule B and Technical Appendix showing the details of its proposed earth station operations at the Pebble and Trident Sites. Those documents provide relevant information relating to the earth station operating parameters, performance information and radiation hazard analyses. At all four new remote sites, Alaska Communications Internet will operate a 2.4m General Dynamics (the “2.4m”) earth station with a Prodelin antenna, which is on the Commission’s Approved Non-Routine Earth Station Antennas List (“Non-Routine Antenna List”).¹⁰ Moreover, Alaska Communications Internet will operate the earth stations below the maximum EIRP spectral density (“ESD”) levels previously approved by the Commission.¹¹

II. Discussion

This STA requests seeks authority to operate four remote earth station sites at various locations in the Alaska Bush, which will communicate with the C-band network hub operated by Alaska Communications Internet under the *ACI Network License* via the EUTELSAT 115WB satellite in the C-band.

A. New Site Locations

Alaska Communications Internet seeks to operate the following four sites as part of its C-band VSAT network in Alaska:

¹⁰ Alaska Communications Internet will operate the General Dynamics Prodelin Antenna Model 1251 at the Trident Sites, and its newer, technically identical variant, the Model 1241 at the Pebble Site. Alaska Communications Internet will operate these earth stations at maximum EIRP spectral density (“ESD”) levels lower than those previously authorized by the Commission. *See* Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>.

¹¹ Each site will utilize an iDirect modem, which assigns individual time slots for each 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.

The Trident Sites

- North Naknek Facility
(geographic coordinates: 58° 43' 41.4" N, 157° 0' 26.2" W)
- Akutan Facility
(geographic coordinates: 54° 7' 59.3" N, 165° 47' 22.1" W)
- Sand Point Facility
(geographic coordinates: 55° 20' 10.9" N, 160° 30' 8.3" W)

The Pebble Site

- Pebble Mine Facility
(geographic coordinates: 59° 45' 26.0" N, 154° 54' 22.8" W)

Each site will use a technically identical 2.4m earth station that is on the Commission's Non-Routine Antenna List.¹² 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 attached Schedule B that it will operate the terminals at maximum ESD levels in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules.¹³

At the each of the Trident Sites, the earth station will be mounted on a previously-installed pole in an area inaccessible to the general public. At the Pebble Site, which is located at an airstrip to support freight and cargo management, the earth station will be placed on a non-penetrating mount on an existing rooftop, also inaccessible to the general public. These 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,"¹⁴ and thus they fall within the exemptions

¹² *Supra* n.10.

¹³ *See* 47 C.F.R. § 25.218(d).

¹⁴ 47 C.F.R. § 1.1307(a)(4).

of Section 1.1306(a)-(b) and Note 1 to that rule.¹⁵ 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 this request, which was completed on May 6, 2019.¹⁶ Pursuant to Sections 25.115(c)(2)(ii) and 25.203 of the Commission's rules,¹⁷ 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 Trident sites.

As demonstrated in the attached frequency coordination reports, as coordinated and limited, there is no potential for interference into other users of the C-band spectrum sought herein by Alaska Communications Internet. Moreover, Micronet received no objections in response to its Prior Coordination Notices, and Alaska Communications Internet currently operates its network with no reported cases of interference. Alaska Communications Internet will coordinate any additional hub or remote operations prior to bringing them into use as part of the C-band VSAT network.

¹⁵ 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.").

¹⁶ Alaska Communications Internet originally completed coordination the Trident and Pebble Sites on April 30, 2019 but re-coordinated the sites as of May 6, 2019 at higher maximum power levels. Now, the coordinated values at each site are "worst-case" scenario and, in reality, Alaska Communications Internet will operate below the coordinated levels at all times pursuant to the parameters provide in the Schedule B.

¹⁷ See 47 C.F.R. §§ 25.115(c)(2)(ii) and 25.203.

C. The C-Band Temporary Freeze Public Notice

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 3.7-4.2 GHz band, effective as of April 19, 2018.¹⁸ The *Temporary Freeze Public Notice* does not include a freeze on requests for special temporary authority for short-term operations, and thus the instant request is outside the scope of the freeze. Furthermore, grant of this STA Application will strongly serve the public interest by enabling the delivery of critically needed broadband telecommunications and Internet access services in the Alaska Bush, where terrestrial connectivity is mostly unavailable.

In conjunction with its forthcoming request for regular authority to operate the Trident sites as part of the network licensed under its existing *ACI Network License*, Alaska Communications Internet intends to seek a waiver, to the extent required, of the *Temporary Freeze Public Notice*. As discussed in the *Silver Bay STA* Legal Narrative, grant of that waiver request, when filed, would enable Alaska Communications Internet to expand its delivery of reliable and effective broadband services to additional remote locations, namely Trident processing plants for employee and operational communications.¹⁹

¹⁸ 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*"). See also, Public Notice, GN Docket Nos. 17-183, 18-122, "International Bureau Announces 90-Day Extension of Filing Window, to October 17, 2018, to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band; Filing Options for Operators with Multiple Earth Station Antennas," DA 18-639 (rel. Jun. 21, 2018).

¹⁹ See *Silver Bay STA*, Legal Narrative, Section II.C. To the extent that the Commission deems the *Temporary Freeze Public Notice* applicable here, Alaska Communications Internet hereby seeks a waiver of that freeze for the reasons set forth in Section II.C of the *Silver Bay STA*, Legal Narrative which it incorporates here by reference.

III. Request for Special Temporary Authority and 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 Friday, May 17, 2019. 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, the *ACI Modification Application* is on file with the Commission and the Public Notice period for the application has closed. This STA request will ensure Alaska Communications Internet has appropriate authority during the Commission’s ongoing review of the *ACI Modification Application* and until such time as it is able, consistent with the technical limitations of the Commission’s International Bureau Filing System (“MyIBFS”) to file an application for long-term commercial authority for the operations proposed herein.

This interim authority is critical to ensure delivery of satellite services to these locations, and grant of the requested 60-day STA will strongly serve the public interest by allowing Alaska Communications Internet to provide broadband services to additional remote Alaskan businesses that must rely on this service for basic connectivity needs. Grant of the STA will allow Alaska Communications Internet to serve underserved communities in the remote Alaska Bush and help improve the local economy, enhance economic opportunity and well-being of its residents, and bridge the digital divide. Users will have broadband Internet access, e-mail, voice and data services, greatly enhancing economic opportunities in these remote locations. Finally, grant of this application will also create an additional competitive alternative for customers in the Alaska Bush, an undeserved area with little access to telecommunications connectivity.

IV. Conclusion

Based on the foregoing, the public interest would be served by a grant of this STA to Alaska Communications Internet to operate four additional sites as part of its C-band VSAT network in Alaska for a period of 60 days, as requested herein.