

GCI Communication Corp.

Approved by OMB
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
STA for Kotzebue FAA ASTIES

1. Applicant

| | | | |
|------------|--------------------------|---------------|--------------------------|
| Name: | GCI Communication Corp. | Phone Number: | 907-868-5615 |
| DBA Name: | | Fax Number: | 907-868-9817 |
| Street: | 2550 Denali St, Ste 1000 | E-Mail: | gclicensemanager@gci.com |
| City: | Anchorage | State: | AK |
| Country: | USA | Zipcode: | 99503 -2737 |
| Attention: | Ms Cynthia L Hall | | |



File # SES-STA-20190812-01044
Call Sign 821-19 Grant Date 8-21-19
(or other identifier)
Term Dates
From: 8-21-19 To: 10-20-19
Approved: Paul E. Hall

| | | | |
|---|--------------------------|--|----------------|
| 2. Contact | | | |
| Name: | Cindy Hall | Phone Number: | 907-868-5615 |
| Company: | GCI Communication Corp | Fax Number: | 907-868-9817 |
| Street: | 2550 Denali St, Ste 1000 | E-Mail: | chall2@gci.com |
| City: | Anchorage | State: | AK |
| Country: | USA | Zipcode: | 99503 -2737 |
| Attention: | | Relationship: | Same |
| (If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.) | | | |
| 3. Reference File Number or Submission ID | | | |
| 4a. Is a fee submitted with this application? | | | |
| <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). | | | |
| <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee | | | |
| <input type="radio"/> Other (please explain): | | | |
| 4b. Fee Classification CGX – Fixed Satellite Transmit/Receive Earth Station | | | |
| 5. Type Request | | | |
| <input checked="" type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input type="radio"/> Other | | | |
| 6. Requested Use Prior Date 08/19/2019 | | | |
| 7. City Kotzebue | | 8. Latitude (dd mm ss.s h) 66 53 15.0 N | |

| | | | |
|--|----|--|-------------------------|
| 9. State | AK | 10. Longitude (dd mm ss.s h) | 162 36 31.0 W |
| 11. Please supply any need attachments. Attachment 1: Exhibit A | | Attachment 2: Exhibit B | Attachment 3: Exhibit C |
| 12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.) | | | |
| Fixed Satellite service supporting air traffic control | | | |
| 13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes. | | | |
| 14. Name of Person Signing Chris Mace | | 15. Title of Person Signing VP, Network Services & Chief Engineer | |
| WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503). | | | |

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Applicant: GCI Communication Corp
Call Sign: None
File No.: SES-STA-20190812-01044
Special Temporary Authority ("STA")

GCI Communication Corp. GC1 is granted special temporary authorization for 60days, beginning August 21, 2019 to operate a 4.5 meter earth station in Kotzebue, AK with the Galaxy 18 (S2733) satellite at the 123 W.L. orbital location and the ANIK F3 (S2703) satellite at the 118.8 W.L. orbital location in the 3700-4200 MHz (Space-to Earth) and 5925-6425 MHz (Earth-to-space) frequency bands under the following conditions:

1. Operations must comply the existing station authorization currently operated by the Federal Aviation Administration under call sign E960346.
2. All operations shall be on an unprotected and non-harmful interference basis, GCI, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference and must inform the Commission, in writing, immediately of such an event.
3. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending or future GCI applications.
4. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat License LLC's risk.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective upon release.



File # SES-STA-20190812-01044
Call Sign _____ Grant Date 8-21-19
(or other identifier)
Term Dates
From: 8-21-19 To: 10-20-19
Approved: Paul E. Hines

GCI Communication Corp.
Application for Special Temporary Authority

APPLICATION FOR SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 25.120 of the Federal Communications Commission (the “FCC” or “Commission”) rules, 47 C.F.R. §25.120, GCI Communication Corp. (“GCI”) is seeking a 60-day special temporary authorization (“STA”) to provide service via two fixed satellite service (“FSS”) earth stations in the 3.7-4.2 and 5.925-6.425 GHz band (the “C-Band”).¹ GCI submits this request pursuant to informal FCC Staff discussions and is seeking temporary authorization to provide service via 3.6 meter Scientific Atlanta 8136 antenna earth stations (the “Station”) located at Kotzebue, AK to communicate with Galaxy 18 and ANIK F3. The Station is an existing station, currently licensed to and owned and operated by the Federal Aviation Administration (“FAA”). The site, call sign E960346, is currently part of the FAA Alaskan Satellite Telecommunications Infrastructure (ASTI) program, which links the Alaskan Air Route Traffic Control Center in Anchorage, Alaska with 64 FAA facilities throughout the region.² This infrastructure provides Alaska with 90 percent of its inter-facility communications for critical, essential and routine air traffic control services supporting commercial aviation.³ This includes communications for commercial airline service in Alaska, commercial international over the pole flights, as well as commercial international flights to the Asia-Pacific. GCI seeks this STA to

¹ GCI recognizes that there is a current freeze “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.” The freeze on commercial C-band earth station activities does not apply to (a) STA requests for FSS earth station licenses in the C-Band and (b) the operations at issue given their longstanding DBE status. Once granted, GCI will provide ongoing service via the Station solely to the FAA that would not change the status quo in terms of earth station operations in the C-Band. Operations would be limited to FAA services. Out of an abundance of caution, if this STA request 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.” 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).

² See L3Harris, Alaskan Satellite Telecommunications Infrastructure (ASTI) <https://www.harris.com/solution/alaskan-satellite-telecommunications-infrastructure-asti> (last visited Aug. 7, 2019).

³ *Id.*

GCI Communication Corp.
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license the above-referenced existing antenna on C-Band spectrum as soon as possible, but no later than August 16, 2019, in order to support these critical U.S. aviation communications in Alaska.

GCI is requesting an STA for a period not to exceed 60 days pursuant to 47 C.F.R. §25.120(3), and will be filing a request for regular authority for this service, therefore this application need not be placed on public notice and should be granted expeditiously pursuant to the FCC's rules. GCI's operation of this Station would not cause harmful interference into surrounding networks, and there are extraordinary circumstances supporting the grant of these temporary operations which are in the public interest and any delay in the institution of these temporary operations would seriously prejudice the public interest.

Grant of this request for STA is necessary for GCI to provide critical telecommunications services in rural Alaska exclusively to the FAA. As documented in Attachment A to this filing, the FAA is migrating from the FAA-owned satellite infrastructure to commercial satellite services provided by L3Harris Technologies and its carrier partners. As documented in Attachment B, L3Harris Technologies has chosen GCI as its carrier partner to provide C-Band satellite communications services at designated locations in Alaska as part of the FAA's ASTI program. The migration from the FAA infrastructure to GCI is scheduled to occur on August 19, 2019, and the continuity of service at this time is imperative. GCI needs authority to operate by August 16, 2019 so that it can install equipment and be operational by August 19th. Although GCI will be filing an application for regular authority of the Station within the next 60 days, GCI is still completing the regulatory reviews, notifications, and analyses required to be completed prior to filing that application, which will not be completed by this date due to regulatory

GCI Communication Corp.
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timetables and guidelines.⁴ Hence, GCI is seeking this STA. Without a grant of this requested temporary authority, GCI will be unable to support ongoing critical U.S. aviation communications in Alaska. This includes critical communications for international over the pole (North Pole) flights, as well as international flights to the Asia-Pacific.

GCI's request for an STA at this location and for this service qualifies as "extraordinary circumstances requiring temporary operations in the public interest," for which "delay in the institution of these temporary operations would seriously prejudice the public interest."⁵ A grant of this STA would allow GCI to provide critical services to the FAA over this license once the migration occurs. On August 19, 2019, the FAA's ASTI program will rely on GCI's services to support critical aviation communications in some of the most rural portions of the country, linking pilots to the world outside of their remote location.

Allowing a STA to permit GCI to provide service over the C-Band, for 60 days, would certainly be in the public interest. Providing critical service to the federal government, and specifically the FAA, is a direct life safety issue for proper aircraft separation and control, and illustrates a "compelling reason" to expeditiously grant the requested STA. The service provided by GCI at this site will enable pilots to communicate with one another and air traffic controllers to prevent collisions, accidents, and to preserve human life. GCI is in the process of preparing a license application for regular authority, and is obtaining all necessary documentation to file such an application within the next 60 days. Due to the need to deliver telecommunications service to the FAA by August 19, 2019, and thus provide service via this site, GCI requests an STA to be granted no later than August 16, 2019.

⁴ GCI is currently completing an environmental review pursuant to 47 CFR 1.1307, completing an analysis for a coordination report pursuant to 47 CFR §§ 25.115(c)(2)(ii); 25.130(b)(1); 25.131(d); 25.203(c).

⁵ 47 C.F.R. §25.120(b)(1).

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GCI's proposed utilization of earth station antennas as detailed in this STA application does not require FAA notification prior to construction pursuant to the FCC's rules, as the height of each antenna will not be altered and will remain under 6.10 meters or 20 feet (3.6 meters).⁶

⁶ See 47 C.F.R. § 17.7.



U.S. Department
of Transportation
**Federal Aviation
Administration**

800 Independence Ave., SW.
Washington, DC 20591

FAA-FTI-19-16948
July 19, 2019

L3Harris Technologies
Attn: Mr. Doug Hernandez
Mail Stop F-9212
1025 West NASA Boulevard
Melbourne, FL 32919

Subject: Contract Number DTFA01-02-D-03006
FAA Telecommunications Infrastructure (FTI) Program
Letter of Intent to Order C-Band Satellite Communications Services at
Designated Locations in Alaska

Dear Mr. Hernandez:

The purpose of this letter is to advise you of the Federal Aviation Administration's intent to order C-band satellite communications services at designated locations in Alaska. The sites are currently part of the FAA's Alaskan Satellite Telecommunications Infrastructure (ASTI) program and are listed in Attachment 1 to this letter. To support the process, it is our understanding that L3Harris Technologies or its selected service provider will need to apply to the Federal Communications Commission (FCC) for new C-band earth station licenses at these locations. In the application to the FCC, L3Harris Technologies or its selected service provider should identify the database entries (DBEs) and call signs for the FAA sites as a reference. This information is also provided in Attachment 1.

In addition, the FAA will provide a separate communication to the FCC advising them of our intent to discontinue use of the FAA-owned ASTI C-band earth stations at the affected locations.

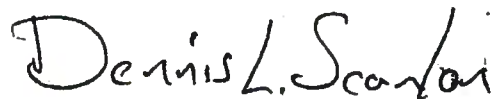
The FAA point-of-contact for this project is:

Mr. Steve Murphy, FTI Implementation Manager
Phone: 603-881-1122
E-mail: Steve.Murphy@faa.gov

While this initial action addresses the 10 sites listed in Attachment 1, this guidance and process will apply to future sites for which the FAA may elect to migrate from the FAA-owned satellite infrastructure to commercial satellite services provided by L3Harris Technologies and its carrier partners.

Should you have any questions, please contact me at 202-267-9422 or via e-mail at Dennis.Scanlon@FAA.gov.

Sincerely,

A handwritten signature in black ink that reads "Dennis L. Scanlon". The signature is written in a cursive style with a large, stylized "D" and "S".

Dennis L. Scanlon
Contracting Officer
DOT | Federal Aviation Administration
ATC Communications, AAQ-320

Attachment 1: FAA DBE and Callsigns



L3HARRIS™

August 12, 2019

GCI Communication Corp.
2550 Denali St., Ste 1000
Anchorage, AK 99503
Attn: Kara Azocar, GCI Regulatory Counsel

Dear Ms. Azocar,

L3Harris Technologies has chosen GCI Communication Corp. as its carrier subcontractor to provide C-band satellite communications services at designated locations in Alaska as part of the Federal Aviation Administration's Telecommunications Infrastructure (FTI) program. The sites are currently part of the FAA's Alaskan Satellite Telecommunications Infrastructure (ASTI) program and are being transitioned to the FAA's FTI program. To support L3Harris Technologies request for digital T1 access service, it is our understanding that GCI Communication Corp. will be required to apply to the Federal Communications Commission (FCC) for new C-band earth station licenses at these locations. In the application to the FCC, GCI should identify the database entries (DBEs) and call signs for the existing sites as well as include the following information within their application:

- FAA's stations are listed in the FCC database under the International Bureau Filing System Data Base Entries (DBE's).
- These satellite operations support critical U.S. aviation communications in Alaska, and continuity of service is imperative.
- The C-band earth station freeze on commercial C-band earth station activities does not apply to these operations given their longstanding DBE status. Moreover, granting of the license applications would not change the status quo in terms of earth station operations in the C-band. Operations would be limited to FAA services.

In addition, L3Harris has requested the FAA provide a separate communication to the FCC advising them of their intent to discontinue use of the FAA-owned ASTI C-band earth stations at these locations. While this direction addresses the 10 sites listed in the table below this guidance and process will also apply to future sites for which L3Harris may elect to procure commercial satellite services provided by GCI Communications Corp.



Task Order Statement of Work (SOW)
OGG ATCT (Maui, HI) LAN Rewiring Project

The locations are identified by the DBE's and call signs for the FAA sites are provided in the table below.

| City | FAA Location ID | Callsign |
|---------------|-----------------|----------|
| Huslia | HSL/HLA | None |
| Cape Yakataga | CYT | E160071 |
| Togiak | TOG | E050295 |
| Hooper Bay | HPB | E050306 |
| St George | PBV | E050312 |
| Kotzebue | OTZ | E960346 |
| Bethel | BET | E960349 |
| Illiamna | ILL | E960355 |
| Yakatat | YAK | E960358 |
| Barrow | BRW | E960362 |

Please note that this letter replaces the prior versions that were sent on August 9, 2019 and earlier today.

Do not hesitate to contact me and Doug Abel with any questions or comments.

Sincerely,

Pedro
"Pete"
Olavarria

Digitally signed by Pedro "Pete"
Olavarria
DN: cn=Pedro "Pete" Olavarria,
o=Harris Corporation, ou=Sr.
Subcontracts Manager,
email=polavarri@harris.com,
c=US
Date: 2019.08.12 15:39:18
04'00'

Pete Olavarria

L3Harris Subcontracts Manager

cc: Robert Manuel, Doug Abel, Chris Schrader