

**GCI Communication Corp.
Application for Renewal of Special Temporary Authority**

APPLICATION FOR RENEWAL OF 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”) requests a renewal of its special temporary authorization (“STA”)¹ to continue to operate, for 60 days or less pending a decision on its modification application,² a temporary fixed satellite service (“FSS”) earth station in the 3.7-4.2 and 5.925-6.425 GHz bands (the “C-Band”).³ Specifically, GCI is seeking a continuation of its temporary authorization to operate a currently-licensed antenna associated with Call Sign E960388 (the “Station”), under modified parameters that will allow it to communicate with a new satellite, Call Sign S2947.⁴ GCI’s operation of this Station does not cause harmful interference into surrounding networks,⁵ and as demonstrated below, there are extraordinary circumstances that continue to support the grant of these temporary operations that

¹ See IBFS File No. SES-STA-20190821-01086 (filed Aug. 21, 2019) (the “Initial STA”).

² See IBFS File No. SES-MOD-20190913-01169 (filed Sept. 13, 2019) (“Barrow Modification Application”).

³ 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.” 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 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).

⁴ In this application, GCI requests to extend the western azimuth limit of the 9.15m antenna associated with Call Sign E960388 (antenna #1 on the existing license) from 145W to 194W in order to be able to view a new satellite (H3e) necessary to manage the capacity associated with GCI’s network.

⁵ GCI is only requesting to extend the western azimuth limit of one of the Station’s antennas, it is not seeking to make any material changes (i.e., EIRP, EIRP density, emissions designator, etc.) to its current authorization.

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

An STA remains necessary for GCI to continue providing reliable communications services, including critical telehealth services, to rural and remote hospitals and health clinics in Alaska as explained in the Initial STA application. 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.”⁶ A grant of this requested renewal would continue to allow GCI to provide critical health communications services to remote and rural health clinics in Alaska. GCI’s services support the delivery of telemedicine services such as teleradiology, remote patient monitoring, medical network solutions, and live video-conferencing to customers in Alaska. GCI has witnessed firsthand the transformational benefits of telemedicine for health care delivery in Alaska. Telemedicine improve healthcare in areas that traditionally have few physicians and even fewer medical specialists in a variety of medical fields, including audiology, cardiology, dental, family medicine, neurosurgery, ophthalmology, pediatrics, psychiatry, and women’s health. In most instances, GCI’s network is the only way that rural Alaskans may gain access to such specialists. For example, without telepsychiatry services, residents seeking psychiatric care in several remote villages would either have to wait for a sporadic visit from a traveling psychiatrist, or would have to travel vast distances – usually at a prohibitively high cost – to seek the medical help that they needed.

Neither of these options would likely be possible during the harsh long Alaskan winter. GCI’s

⁶ 47 C.F.R. §25.120(b)(1). The International Bureau has determined that allowing GCI to utilize the C-Band to support telehealth services to local health clinics in remote areas of Alaska is in the public interest. *See generally In the Matter of GCI Communication Corp. Request for Waiver of Temporary Freeze on Applications for New Fixed Satellite Service Earth Station License in the 3.7-4.2 GHz Band*, IBFS File No. SES-LIC-20190509-00583, Order, DA 19-1069 (rel. Oct. 24, 2019).

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network enables a patient to visit with a specialist remotely, via a remote village clinic, on their own schedule.

The covered health clinics rely on the C-Band as the primary means of transmission for their communication needs. This is due in large part to the challenging nature of providing telecommunications services 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.”⁷ GCI relies on the C-Band in order to provide its FSS operations, and has a very long history of providing C-Band satellite communications solutions in Alaska in innovative ways that advance the satellite technology space. Fiber, microwave operations and other satellite bands are not options for this service.

- Fiber is hundreds or thousands of miles away from most areas of Alaska due to the unique attributes of the State, including, extreme weather, government-related barriers, and the general topography of the Arctic.⁸ The distance between many of GCI’s C-Band earth stations and fiber headends is vast (e.g., hundreds of miles), and long fiber runs in Alaska are not feasible solutions. In many areas, such fiber would run over the Arctic tundra and would need to be safeguarded against damage caused by the complex and changing structure of permafrost,

⁷ *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)).

⁸ Much of the land in rural Alaska is protected by numerous federal and state laws that limit human activity, and thus preclude fiber builds.

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which can range in thickness from a single meter to many hundreds of meters.⁹

These areas may also require submarine fiber, which would have to run across hundreds of miles of open arctic ocean and would need to be safeguarded against additional elements, including ice and rough sea floors.

- While GCI relies on its TERRA microwave radio system throughout the state, it has found that such microwave systems are particularly susceptible to extreme weather in these remote and rural areas, such as the freezing and icing that occur during the Alaskan winter and spring months (roughly anywhere from September to June) and result in significant damage to the microwave radio antennas and wave guides, leading to link degradation and service outages.
- GCI uses the Ku-Band in areas where it can obtain the amount of capacity it needs. This is not case here. As a general matter, the currently available Ku- and Ka-band are not realistic alternative options due to (a) the limited lower link availability resulting from more challenging propagation conditions and higher link margins required for Ku- or Ka-band fading;¹⁰ (b) the prohibitively high cost associated with replacing or upgrading ground segment equipment; and, (c) the lack of available Ku- or Ka-band satellites having satisfactory coverage over the State of Alaska – in other words, there is not enough capacity or coverage of Ku-band satellites to move all of GCI’s C-Band services and there is minimal, if any, Ka-Band coverage in Alaska.

⁹ In addition, uneven freezing and thawing at or near the surface can result in dramatic changes to landforms, such as ice wedges (i.e., growing cracks in the ground) and pingos (i.e., small hills that arise quickly due to subsurface pressures), which can damage buried fiber optic cable.

¹⁰ For instance, weather characteristics such as rain, snow, or fog may cause signal fade on these satellite bands.

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The substantial public service record of GCI indicates that the company is committed to providing service to consumers in Alaska. As noted herein, GCI has sought regular authority for the requested modifications to E960388. However, because GCI does not want these critical services to be implicated during the pendency of this request, it is also requesting a renewal of its STA. Continued service illustrates a “compelling reason” to grant the requested renewal, and would certainly be in the public interest.