

**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 60-day special temporary authorization (“STA”), commencing on July 7, 2020, to continue operating a new remote earth station site in Naknek, Alaska, as part of its existing C-band very small aperture terminal (“VSAT”) network.² Alaska Communications Internet recently filed an application to modify its VSAT network license to operate this site and others under a regular grant of Commission authority.³ Currently, the Naknek site is operating under an STA grant issued by the Commission on May 6, 2020, which will soon expire.⁴

The Naknek site supports delivery of broadband service to Silver Bay Seafood, LLC (“Silver Bay Seafood”), an integrated processor of frozen salmon, herring, and squid products for U.S. domestic and export markets.⁵ Alaska Communications Internet seeks to continue operating

¹ 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 File No. SES-MOD-20200521-00555 (filed May 21, 2020). Section 25.115(c)(2) of the Commission’s rules, 47 C.F.R. § 25.115(c)(2)(iv, vi), permits operation of new C-band VSAT network sites under certain conditions “immediately after the public notice is released” of the application to add the site to the network license. The Commission has not yet placed this MOD filing on Public Notice.

⁴ File No. SES-STA-20200211-00153.

⁵ Alaska Communications Internet currently supports Silver Bay Seafood operations in False Pass under the *ACI Network License*. See Alaska Communications Internet LLC, File Nos. SES-MOD-20190828-01106, Call Sign E170205 (granted Jan 17, 2020).

the site in portions of the C-band at fixed locations in Alaska while communicating with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position.

Grant of this STA request will serve the public interest because it will enable Alaska Communications Internet to continue critically needed broadband services to support Silver Bay Seafood. As one of the largest seafood companies in Alaska, Silver Bay Seafood needs reliable broadband services to support its operations, management and personnel, manage logistics, coordinate shipments, establish a solid fish buying system, and keep its employees in Naknek connected to their families and the larger world. In general, under this STA, Alaska Communications Internet will provide critical telecommunications connectivity in extremely remote areas of the Alaska bush to help continue to bridge the digital divide in some of the nation's most isolated communities.⁶

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.⁷ Alaska Communications

⁶ 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.

⁷ 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).

Internet provides essential broadband and voice-over-Internet Protocol (“VoIP”) services to enterprise, business, educational, health care, and residential customers throughout the state.

The *ACI Network License* authorizes Alaska Communications Internet to operate a network of C-band satellite earth stations used to meet the critical communications needs of a diverse group of users in remote locations in Alaska, including Alaska Native corporations, schools and libraries supported by the Commission’s Schools and Libraries Universal Service Support Mechanism (“E-rate”), rural health care providers supported by the Commission’s Rural Health Care Universal Service Support mechanism, and commercial mining, fishing, and seafood canning businesses, as well as to provide telephone and broadband communications backhaul services connecting telephone central offices operated by Alaskan small and rural telephone cooperatives.

Alaska Communications Internet 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 new site. Those documents provide relevant information relating to the earth station operating parameters, performance information, radiation hazard analysis, and frequency coordination.

II. Discussion

This STA request seeks authority to operate one (1) remote earth station site in Alaska to communicate with the network hub operated by Alaska Communications Internet under the *ACI Network License* via the EUTELSAT 115WB satellite in the C-band.

A. New Site Location

Alaska Communications Internet seeks to operate the following site as part of its C-band VSAT network in Alaska under this STA:

- Silver Bay – Naknek
General Dynamics Prodelin Model 1241 (2.4-meter)
(geographic coordinates: 58° 44’ 41.4” N, 156° 57’ 146.4” W)

At the Silver Bay Naknek site, Alaska Communications Internet will operate a 2.4m VSAT earth station that is authorized in the *ACI Network License* for similar fixed C-band operations and is on the Commission’s Non-Routine Antenna List.⁸ 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 incorporated Schedule B that it will operate the VSAT at maximum ESD levels below those currently authorized in the *ACI Network License* and in compliance with the ESD mask set forth in Section 25.218(d) of the Commission’s rules.⁹

Moreover, the earth station will be mounted on a previously installed pole in an area inaccessible to the general public. Its planned location is 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,”¹⁰ and thus they fall within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.¹¹ Accordingly, no environmental assessment is required as part of this application because the 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 STA request, which was completed on

⁸ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>; e.g., Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075.

⁹ See 47 C.F.R. § 25.218(d).

¹⁰ 47 C.F.R. § 1.1307(a)(4).

¹¹ 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.”).

December 23, 2019. Pursuant to Sections 25.115(c)(2)(ii) and 25.203 of the Commission's rules, 47 C.F.R. §§ 25.115(c)(2)(ii) and 25.203, 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 station.

As demonstrated in the attached frequency coordination report, 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.

III. STA Request & Public Interest Considerations

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. Alaska Communications Internet seeks this STA to continue operating the Naknek site during the pendency of its application for long-term regular authority to serve this site under the *ACI Network License*.

Grant of this 60-day STA will strongly serve the public interest by allowing Alaska Communications Internet to provide broadband services to an additional remote Alaskan community that must rely on this service for basic connectivity needs. The proposed site will enable service to an Alaska bush seafood business and its employees, who collectively make up a large portion of the residents of Naknek. Grant of this STA and the forthcoming associated application would thus greatly advance the public interest goals of Commission to expand the

availability of affordable broadband services and thereby provide enhanced economic growth and development opportunities for residents of the area.¹²

Reliable communications are particularly important in rural and remote areas of Alaska, including the site that will be served under this request. More broadly, Alaska Communications' customers, which include a broad array of rural health care providers, the Federal Aviation Administration, other federal and state government entities, public safety first responders, Alaska native-owned economic development enterprises, among others, are well aware that C-band services are consistently more stable and perform more reliably than Ku- or Ka-band alternatives. As a result, these customers routinely insist that their services be provisioned using C-band connectivity and will specifically choose C-band services over other options.

Grant of this STA request will allow Alaska Communications Internet to further expand its network, create an additional competitive alternative for customers in the Alaska bush, an underserved area with little access to telecommunications connectivity, and help improve the competitive landscape in the Alaska bush and contribute to the regional well-being of the Naknek area.

IV. Conclusion

Based on the foregoing, Alaska Communications Internet requests that the Commission grant authority to Alaska Communications Internet to operate the additional remote site identified herein as part of its C-band VSAT network in Alaska for a period of 60 days, commencing on July 7, 2020.

¹² See generally *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17663 (2011) ("*Transformation Order*").