

**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 Monday, November 30, 2020, to operate a new remote earth station site in Hooper Bay, Alaska as part of its existing C-band very small aperture terminal (“VSAT”) network.² Alaska Communications Internet seeks to communicate with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position.

Alaska Communications Internet will operate the site to improve network resiliency and survivability, as well as to augment backhaul capacity for voice and broadband traffic, in the Native Village of Hooper Bay (“Hooper Bay”) and provide critical backhaul upgrades for the Hooper Bay public use networking center. The project is being funded by a Coronavirus Aid, Relief, and Economic Security Act (“CARES Act”) grant to improve broadband facilities, equipment and services in the village. The CARES Act appropriated \$100 million for additional grants under the USDA’s Rural Utilities Service (“RUS”) broadband deployment pilot program, and Alaska Communications Internet seeks to help Hooper Bay effectively utilize the grant to

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*”).

bridge the digital divide in this extremely remote Alaska bush community.³ Grant of this STA will serve the public interest because it will enable Alaska Communications Internet immediately to provide Hooper Bay with reliable C-band satellite backhaul connectivity and improved network resilience. Following this STA request, Alaska Communications Internet intends in the near future to withdraw its currently pending application to modify the *ACI Network License*⁴ and re-file to include the Hooper Bay site (among others).

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.

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 OTZ and other Alaska Native corporations, schools and libraries supported by the Commission’s Schools and Libraries Universal Service

³ 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 and are not 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.

⁴ See Alaska Communications Internet LLC, File No. SES-MOD-20200521-00555, Call Sign E170205.

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).

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 Hooper Bay 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:

Hooper Bay

- General Dynamics Model 1385 (3.8-meter)
(geographic coordinates: 61° 31’ 40.0” N, 166° 6’ 22.5” W)

At the Hooper Bay site, Alaska Communications Internet will operate a 3.8m 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.⁶ Although the 3.8m 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 in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules.⁷

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,"⁸ and thus they fall within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.⁹ 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, for which the coordination notice period closed on October 30, 2020. 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,

⁶ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>. The General Dynamics Prodelin Antenna Model 1385 is a technically identical variant of the previously licensed Prodelin 1383.

⁷ See 47 C.F.R. § 25.218(d).

⁸ 47 C.F.R. § 1.1307(a)(4).

⁹ 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.").

proposed, and prior coordinated microwave facilities within the contours of the proposed earth station.

As demonstrated in the attached frequency coordination report, as coordinated and limited,¹⁰ 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(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 in accordance with that requirement. 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. Alaska Communications Internet intends to file an application for regular authority in a forthcoming updated application to modify *ACI Network License*. This STA request will ensure Alaska Communications Internet has appropriate authority during the Commission's review of the application for long-term operations at Hooper Bay.

Grant of this 60-day STA will strongly serve the public interest by allowing Alaska Communications Internet to support the Native Village of Hooper Bay and bring upgraded

¹⁰ To prevent interference to nearby terrestrial microwave operations, Alaska Communications Internet will limit its transmit operations at the Hooper Bay site as specified in this request (*see* Frequency Coordination Report and Schedule B).

telecommunications services to the community. In support of the CARES Act grant, Alaska Communications Internet will help improve critical broadband services to residents, local businesses, schools, health care providers, and others that rely on the Hooper Bay’s telecommunications infrastructure for their basic connectivity needs. More generally, grant of this STA request will allow Alaska Communications Internet to further expand its network, create improved additional competitive alternative for Alaska Bush businesses with little access to telecommunications connectivity, and help improve the competitive landscape in the Alaska Bush by bridging the digital divide and improving access to opportunities made available by broadband connectivity.

Moreover, Hooper Bay is a small village in Northwest Alaska that cannot be served effectively by terrestrial connectivity (the closest fiber connectivity is at the Quintillion’s submarine cable landing station in Nome, Alaska, which is approximately 200 miles away in a straight line through open ocean). There is no available undersea cabling infrastructure, and no road access to bridge rough terrain and wilderness, able to bridge these two points. Construction of new terrestrial transport facilities to reach the village, let alone scalable fiber optic connections, would be technically and logistically infeasible, and satellite connectivity is the only realistic option for this location.¹¹

¹¹ For a detailed discussion of the challenges of constructing these facilities, see Brian “Butch” Webb and Zachary Casey, “Shore Approaches for Fiber Optic Cables in Arctic Construction,” *Underground Construction* (Mar. 2017) (discussing the specialized horizontal directional drilling (“HDD”) techniques required in the Arctic, because “the known risk from deep ice scour in shallow water would require burial depths that are unachievable with standard methods. Additionally, the large volume of material removed and the consequent stockpiling of the spoil presents an environmental problem in the Arctic that is not acceptable. The HDD technique eliminates this problem and can extend the shore approach further out to sea without the need for any sea bottom plowing or excavation of fragile arctic coastline.”), available at: <https://ucononline.com/magazine/2017/march-2017-vol-72-no-3/features/shore-approaches-for-fiber-optics-cable-in-arctic-conditions>; Environmental Assessment, TERRA Southwest Broadband Telecommunications Project (April 2011)

IV. Conclusion

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

(discussing logistical and environmental challenges of constructing telecommunications facilities in southwest Alaska and rejecting a 100% fiber alternative proposal), *available at:*
<https://www.gc.noaa.gov/documents/alaska-eis.pdf>.