

**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 Friday December 19, 2020, to continue to operate a remote earth station site in Shungnak, Alaska as part of its existing C-band very small aperture terminal (“VSAT”) network² during the Commission’s review of its concurrently filed modification application for long-term operations.³ Consistent with its existing STA for the identical operations proposed herein,⁴ Alaska Communications Internet will operate the site to provide middle mile backhaul support for OTZ Telephone Cooperative Inc. (“OTZ”), a small, Alaska Native, rural incumbent local exchange carrier (“ILEC”) serving the Northwest Arctic Borough of Alaska,⁵ one of the most sparsely populated areas of the nation. OTZ offers telephone, cellular and Internet services to residents of Alaska Native villages throughout the area, which the Commission has targeted as a

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 See Alaska Communications Internet LLC, File No. SES-MOD-INTR2020-03774, Call Sign E170205 (“*ACI Modification Application*”). The subject remote earth station site is included in the *ACI Modification Application*.

⁴ See Alaska Communications Internet LLC, File No. SES-STA-20201019-01139 (expires on December 19, 2020) (“*Shungnak STA*”).

⁵ OTZ is a member-owned cooperative serving remote Tribal villages in the Alaska bush. All OTZ Board members are Inupiat Eskimo and the majority of OTZ staff are Alaska native. <http://otz.net/>.

key region “where the needs [for telecommunications services] are particularly acute.”⁶ Alaska Communications Internet seeks to communicate with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position.

Alaska Communications Internet plays a vital role in helping OTZ bridge the digital divide in the extremely remote Alaska bush communities that it serves.⁷ Alaska Communications Internet currently supports eight (8) OTZ village offices and the OTZ headquarters under the *ACI Network License*. Grant of this STA will serve the public interest because it will enable Alaska Communications Internet continue providing OTZ with reliable C-band satellite backhaul transport connectivity to its additional village office in Shungnak. Alaska Communications has included the Shungnak site in the concurrently filed *ACI Modification Application* for regular long-term authority.

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.⁸ Alaska Communications

⁶ FCC Consumer and Governmental Affairs Bureau, *Lands of Opportunity: Bringing Telecommunications Services to Rural Communities*, at 2 (available at: <http://transition.fcc.gov/indians/opportunity.pdf>).

⁷ 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.

⁸ 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 OTZ and other 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 Shungnak 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 continue 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:

- **Shungnak Village Office**
General Dynamics Prodelin Model 1241 (2.4-meter)
(geographic coordinates: 66° 53' 16.8" N, 157° 8' 18.9" W)

At the Shungnak 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.⁹ 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 identical to 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.¹⁰

Moreover, the earth station is 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,"¹¹ and thus they fall within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.¹² 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.

⁹ 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.

¹⁰ See 47 C.F.R. § 25.218(d).

¹¹ 47 C.F.R. § 1.1307(a)(4).

¹² 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.").

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 September 28, 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, 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 continues to operate 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 so that the Commission may permit operations by Friday, December 19, 2020. 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, Alaska Communications Internet has filed an application for regular authority and this STA request will ensure Alaska Communications Internet has appropriate authority during the Commission’s review of the modification application.

Grant of this 60-day STA will strongly serve the public interest by allowing Alaska Communications Internet to continue supporting OTZ's transition from its legacy middle mile connectivity, which currently relies on a satellite space station that is at or beyond the end of its useful life, to Alaska Communications Internet's backhaul infrastructure. This, in turn, will directly improve critical broadband and other communications services to residents, local businesses, schools, libraries, health care providers, and others in Shungnak that rely on OTZ 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, Shungnak is a small city in Northwest Alaska that is unable to be effectively served by terrestrial connectivity (the closest fiber connectivity is at the Quintillion's submarine cable landing station in Kotzebue, Alaska, which is approximately 150 miles away in a straight line). There is no road access to bridge the rough terrain and wilderness separating these points with terrestrial transport facilities, and the cost of doing so would be prohibitive. 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.¹³

¹³ 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

IV. Conclusion

Based on the foregoing, Alaska Communications Internet requests that the Commission grant authority to Alaska Communications Internet to continue 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.

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) (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>.