

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Application of Alaska Communications) Call Sign: E170205
Internet LLC for Continuation of 60-Day)
Special Temporary Authorization (“STA”)) File No. SES-STA-_____

APPLICATION FOR CONTINUATION OF 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, August 16, 2021, to (a) continue to operate four (4) new remote earth station sites that are currently operating pursuant to an existing grant of special temporary authority;² and (b) obtain special temporary authority to operate six (6) other existing sites at increased power levels as part of its existing C-band very small aperture terminal (“VSAT”) network.³ All ten of these sites are included in Alaska Communications Internet’s recent application to modify the *ACI Network License*, and a grant of this STA request will allow the company to begin or continue service to these customers during the Commission’s review of the application for regular license authority to operate at these sites.⁴ Consistent with its previous STA request, Alaska Communications Internet proposes to continue communicating with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position during the term of this STA.

¹ 47 C.F.R. § 25.120.

² See Alaska Communications Internet LLC, File No. SES-STA-20210609-00921, Call Sign E170205. In that grant, the Commission also authorized Alaska Communications Internet to operate at a fifth site, at Hooper Bay, Alaska. The Commission has since granted regular license authority for those operations under Call Sign E170205, see SES-MOD-2020-121401370 (granted June 11, 2021), so Alaska Communications Internet is no longer including Hooper Bay in this STA request.

³ See Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign E170205, and subsequent modification and amendment applications (“*ACI Network License*”).

⁴ See Alaska Communications Internet LLC, File No. SES-MOD-20210702-01010, Call Sign E170205.

Alaska Communications Internet seeks this STA to provide critical broadband satellite communications services to these locations during the pendency of its upcoming *ACI Network License* modification application. Moreover, grant of this STA request will serve the public interest because it will enable Alaska Communications Internet to optimize its ground station infrastructure to provide higher quality service to its customers and provide broadband connectivity to additional local communities and schools, promoting economic growth, education, and vocational opportunities for residents of the Alaska Bush.

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 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

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).

well as to provide telephone and broadband communications backhaul services connecting telephone central offices operated by Alaskan small and rural telephone cooperatives.

Here, Alaska Communications Internet seeks to: (i) support the Kotlik School in the Lower Yukon School District to provide services to its teachers and students, fostering the growth of Alaskan children; (ii) provide Trident Seafood Corporation (“Trident”) with reliable broadband services at its False Pass facility to support its operations, management and personnel, manage logistics, coordinate shipments and keep its employees connected to their families; (iii) modify the licensed site location of its False Pass earth station serving Silver Bay Seafoods, LLC (“Silver Bay”), per the updated geographic coordinated provided below; and (iv) operate a new 7.0 hub earth station at its existing hub facility in Anchorage, Alaska to maximize operational flexibility and improved end-to-end communications of the network. Alaska Communications also proposes to modify certain operating parameters of six currently licensed sites, in order to provide greater operational flexibility and increase bandwidth in response to customer needs, particularly in light of the ongoing transition of C-band spectrum to terrestrial use in the Lower 48 contiguous states.

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 operations. 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 five (5) new remote earth station sites 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.

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

1. **Kotlik School**
General Dynamics Prodelin Model 1241 (2.4-meter)
(geographic coordinates: 63° 1' 53.0" N, 163° 33' 17.0" W)
2. **Trident False Pass**
General Dynamics Prodelin Model 1241 (2.4-meter)
(geographic coordinates: 54° 51' 54.0" N, 163° 24' 41.0" W)
3. **Silver Bay False Pass**
General Dynamics Prodelin 1385 (3.8 Meter)
(geographic coordinates: 54° 52' 4.5" N, 163° 24' 35.1" W)
4. **Anchorage 7.0m Hub**
RSI Satcom 705CS (7-meter)
(geographic coordinates: 61° 8' 28.4" N, 149° 52' 30.7" W)

At the Kotlik and Trident sites, Alaska Communications Internet will operate a 2.4m General Dynamics (the "2.4m") earth station with a Prodelin antenna, which is on the Commission's Approved Non-Routine Earth Station Antennas List ("Non-Routine Antenna List"). Moreover, Alaska Communications Internet will operate the earth stations below the maximum EIRP spectral density ("ESD") levels previously approved by the Commission.⁶ Similarly, at the Silver Bay site, Alaska Communications Internet will operate a 3.8-meter General Dynamics Prodelin Model 1385, which also appears on the Commission's Non-Routine Antenna List.⁷ As with the other sites, although the Prodelin 1385 does not comply with the gain mask in Section 25.209 of the Commission's rules, Alaska Communications Internet demonstrates in the attached FCC Form 312 Schedule B that it will operate these earth stations in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules and below the maximum ESD levels previously approved by the Commission. At the Anchorage site, Alaska Communications Internet will operate the 7.0m RSI Satcom Model 705CS, an antenna

⁶ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>.

⁷ *Id.*; see Intelsat LLC, Call Sign E110100, SES-LIC-20110627-00745; Escapes Network, LLC, Call Sign E110109, SES-LIC-20110802-00906.

type that has been previously licensed by the Commission for near identical earth station operations.⁸

In addition to the sites listed above, Alaska Communication Internet seeks to operate six (6) sites currently licensed under the *ACI Network License*:

5. **Anchorage 3.8m Hub**
General Dynamics Prodelin Model 1383 (3.8-meter)
(geographic coordinates: 61° 8' 28.4" N, 149° 52' 30.7" W)
6. **Anchorage 2.4 Test Site**
General Dynamics Prodelin 1244 (2.4-Meter)
(geographic coordinates: 61° 8' 28.4" N, 149° 52' 30.7" W)
7. **Naknek**
General Dynamics Prodelin 1244 (2.4-Meter)
(geographic coordinates: 58° 43' 43.7" N, 157° 0' 0.9" W)
8. **Alitak**
General Dynamics Prodelin 1244 (2.4-Meter)
(geographic coordinates: 56° 53' 53.7" N, 154° 14' 47.4" W)
9. **Excursion Inlet**
General Dynamics Prodelin 1244 (2.4-Meter)
(geographic coordinates: 58° 24' 55.3" N, 135° 26' 36.4" W)
10. **St. Paul**
General Dynamics Prodelin 1383 (3.8-Meter)
(geographic coordinates: 57° 7' 23.0" N, 170° 16' 45.0" W)

At each of the above sites (numbered 5 through 10), Alaska Communications Internet is proposing to operate at higher power levels than those currently authorized in the *ACI Network License* and with an expanded satellite arc to maximize operational flexibility.⁹

⁸ See Globecast America Incorporated, *Radio Station Authorization*, File No. SES-LIC-20200821-00897, Call Sign E881143 (Sep. 30, 2020) ("*Globecast License*"). Although the EIRP density levels proposed herein by Alaska Communications Internet are slightly higher than the *Globecast License*, its operations have been fully coordinated and limited as necessary, effectively eliminating the potential for harmful interference.

⁹ As mentioned above, under this STA request, Alaska Communications Internet's proposes to communicate only with Eutelsat E115WB, located at 114.9° W.L.

A. Frequency Coordination

Alaska Communications Internet engaged Micronet Communications, Inc. (“Micronet”) to perform frequency coordination in support of this STA request. 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 reports for these sites, 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 continue to 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 commencement 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 in fact has already filed an application for regular authority to operate at these sites, which is currently pending before the Commission. *See* SES-MOD-20210702-01010. This STA request will ensure Alaska

Communications Internet has appropriate authority during the Commission's review of its forthcoming application for long-term operations at this site.

Additionally, grant of this 60-day STA will strongly serve the public interest by allowing Alaska Communications Internet to provide reliable broadband services to support its customers with new and updated sites throughout the state of Alaska. At the new Kotlik School site, for example, the connectivity Alaska Communications Internet is currently providing and would continue under this STA and an eventual grant of regular authority will support the school and its teachers and staff in fostering the growth and education of Alaskan children, where children from pre-kindergarten to twelfth grade are in attendance. That service is eligible for support under the Commission's E-Rate program. As another example, providing Trident and Silver Bay with reliable broadband services at their False Pass facilities will support operations, management and personnel administration, logistics, and shipment coordination, as well as keeping employees connected with their families which is especially important during the global COVID-19 pandemic. Finally, grant of this STA request will allow Alaska Communications Internet to further expand its network, create an improved additional competitive alternative for Alaskan businesses with little access to telecommunications connectivity, and help improve the competitive landscape in Alaska.

IV. Conclusion

Based on the foregoing, the public interest would be served by grant of Commission authority to Alaska Communications Internet to operate these ten additional remote sites as part of its C-band VSAT network in Alaska for a period of 60 days, as described herein.