APPLICATION FOR 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") is seeking a 60-day special temporary authorization ("STA") commencing immediately, to test and provide limited services via fixed satellite service ("FSS") earth stations (the "Stations") using the 19.950-20.175 GHz and 18.325-18.775 GHz portions of the Ka-band for downlink, and 29.525-29.975 GHz for uplink (together, the "Conventional Ka-Band"). Specifically, GCI is seeking temporary blanket authorization to install and operate CPI 3180 antennas[1] consisting of a reflector mounted on a small tripod ground-mount with an aperture size of 1.8m.[2] The antennas will communicate exclusively with the Intelsat Galaxy 30 satellite located at 125W. Because GCI is requesting an STA for a period not to exceed 60 days pursuant to 47 C.F.R. §25.120(b)(3), and has already filed a request for regular authority for this service,[3] this application need not be placed on public notice and should be granted expeditiously pursuant to the rules. GCI's operation of the Stations will not cause harmful interference into surrounding networks, and as demonstrated below, there are extraordinary circumstances supporting the

[1] GCI ordered Global Skyware 1.8m antennas, but does not believe those antennas will arrive within the next 60 days. Out of an abundance of caution, GCI seeks temporary blanket authorization to install and operate Global Skyware antennas.

[2] GCI's plans for use of a blanket license to operate earth stations in the Conventional Ka-Band throughout the State of Alaska is detailed in its application for permanent authority, and GCI incorporates that information herein by reference. *See* File Number SES-LIC-20211112-01805, filed November 12, 2021.

[3] *See* File Number SES-LIC-20211112-01805, filed November 12, 2021. Due to the pendency of frequency coordination with Iridium pertaining to 29.525-29.975 GHz, FCC staff may defer grant of the application until agreement is reached. Per guidance from FCC Staff, GCI is seeking this STA in order to test and operate without this portion of the band so that it may deploy services in a timely manner during the limited build season in Alaska. *See* Letter from Chris Mace to Marlene Dortch dated January 10, 2022, Supplement, Confirmation No. IB2022000029, File No. SES-LIC-20211112-01805.

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

Grant of this request for STA is necessary for GCI to test the equipment for a new affordable, reliable communications service, that will be utilized by rural Alaskan schools and healthcare facilities, and thus would serve the public interest. GCI intends to launch the new service during the 2022 build season.[4] In Alaska, the build season can be as short as June to September, necessitating testing far in advance in order to strategize deploying during that short time. Without the ability to test prior to the 2022 build season, GCI may be in danger of missing the limited opportunity to launch the planned systems, thus delaying rollout of these critical services.

GCI intends to test in the following locations,[5] which are all located within the area requested for a blanket statewide license:

- Anchorage – 1001 Northway Dr, Anchorage AK 99508
- Fairbanks – 1665 Esro Rd., Fairbanks, AK 99712
- Nome – Within the city of Nome, AK. 64° 30′ 13.80″ N, 165° 25′ 40.80″ W
- Bethel TERRA - 60° 46′ 53.8″ N, 161° 53′ 1.6″ W

GCI will test the following functionality of the equipment:

- Forward and return link performance
- IP Connectivity
- Monitoring capability
- Central management provisioning
- Failover recovery time
- Throughput
- Power outage recovery

[4] Should the 2022 build season begin, and GCI's permanent blanket license application (*See* File Number SES-LIC-20211112-01805, filed November 12, 2021) remain pending, GCI seeks authority to provide service pursuant to this requested STA.

[5] GCI may add additional testing locations and possibly provide service at additional locations, pursuant to this requested STA, should testing be successful prior to grant of the blanket license application.

GCI anticipates that the new Ka-Band services at the tested locations could include:

- Telehealth Services: Satellite data circuit supporting internal/private point-to-point data network extension from clinics. GCI supported healthcare facilities often include subregional health clinics in covered communities, which GCI serves from one location. Uses of the satellite circuit often include Voice-Over Internet Protocol (VoIP) calling, video teleconferencing, internal/private systems/records access, e-mail, and other forms of communications.

- Distance Learning Services: Satellite data circuit primarily supporting Internet access serving a local school district. Secondary access includes VoIP calling, video teleconferencing, internal/private systems/records access, etc.

The 24x7 contact information for the requested operations is as follows: (800) 770-8725.

Allowing a STA to permit GCI to test service over the Ka-Band, for 60 days, would certainly be in the public interest. 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] Indeed, the new service being tested illustrates a "compelling reason" to expeditiously grant the requested STA as it will provide critical services to rural and remote communities in Alaska, and the sooner GCI can test, the sooner it will be able to finalize its plans to roll out these services during the 2022 build season. Ka-band High-Throughput-Satellites ("HTS"), such as the Galaxy 30 satellite, will allow GCI to offer cost-effective high-bandwidth services in a closely matching footprint to its Ku-band VSAT network, which has proven to be successful in rural Alaska. However, as compared to Ku-Band services, these Ka-band installations will enable our customers to supplement critical community services such as healthcare, education, and remote-work at a lower cost and with better service. Moreover, because GCI is working with Iridium to coordinate use of 29.250-

[6] 47 C.F.R. §25.120(b)(1).

29.475 GHz before grant of its pending permanent license application,[7] an extraordinary circumstance such as the short Alaska build season ought not to prohibit GCI from testing services that serve the public interest using the 18.325-18.775, 19.950-20.175, and 29.525-29.975 GHz portions of the Ka-band.

At the time of this filing, one of proposed testing locations (Anchorage – 1001 Northway Dr, Anchorage AK 99508) requires FAA notification prior to construction of the earth station antennas because the proposed antenna structure will be greater than 6.10 meters (20 feet) in height. For this location, GCI will not construct the site until the FAA issues a determination of no hazard and a FAA study is approved. For all remaining known testing locations, prior FAA notification is not required because the proposed antenna structures will be less than 6.10 meters (20 feet) in height.[8]

[7] *See* Letter from Chris Mace to Marlene Dortch dated January 10, 2022, Supplement, Confirmation No. IB2022000029, File No. SES-LIC-20211112-01805.

[8] *See* 47 C.F.R. § 17.7.