

GCI Communication Corp.
Application for Special Temporary Authority

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,¹ to continue to operate, for 60 days or less while awaiting grant of its application for regular authority,² an emergency temporary fixed satellite service (“FSS”) earth station in the 3.7-4.2 GHz band (the “C-Band”). Specifically, GCI is seeking temporary authorization to install and operate a Satcom 3.8 meter CPI Antenna Series 2385 antenna earth station (the “Station”) in Birch Creek Village, AK, Alaska to communicate with ALSAT and GALAXY 13 127 W.L. 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, this application need not be placed on public notice and should be granted expeditiously pursuant to the rules. GCI’s operation of the Station will not cause harmful interference into surrounding networks, and as demonstrated below, there are extraordinary circumstances supporting the 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.

¹ GCI submits that there are “extraordinary reasons . . . that could not have been earlier foreseen” that warrant a waiver of the three working day review period pursuant to 47 C.F.R. § 25.120(a). Here, GCI is seeking immediate support for its microwave communications link that provide service to a healthcare customer in remote areas of Alaska. GCI has explored alternative solutions, but such deployments are not adequate or available in this area of Alaska to provide telemedicine services. As a result, GCI seeks this emergency STA to permit it to begin construction due to the winter weather fast approaching this month.

² See IBFS File No. SES-LIC-INTR2022-01874, filed June 9, 2022.

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Grant of this request for STA is necessary for GCI to provide reliable communications services for telemedicine applications to the Council of Athabascan Governments (CATG), a healthcare customer, and would thus serve the public interest. GCI seeks this STA now so that it may construct the necessary equipment onsite at the clinic in the community to allow CATG to use new and more advanced telemedicine applications. In addition to serving the public interest through telemedicine, GCI will be shifting capacity off of the Galaxy 18 spacecraft to make this happen, which will lead to added capacity for consumer services sharing that satellite spectrum throughout the State. GCI seeks this STA during the pendency of a request for permanent authority because equipment arrived sooner than expected, and it is in the public interest for consumers in remote Alaska to have access to critical, advanced telemedicine services as soon as possible.

Due to the critical services at stake, GCI has examined other potential options that would not require an STA. For instance, GCI explored whether its existing Ku-Band blanket license could be utilized in this instance. Unfortunately, due to capacity limitations, Ku-Band could not be used in this case. GCI also explored whether Ka-Band could be used, pursuant to an existing blanket STA. Unfortunately, this region falls outside of our Ka-Band coverage range. As a result, GCI's remaining option is to seek this emergency STA to utilize the above-referenced antenna on C-Band spectrum, while it awaits grant of permanent authority for these operations. Without a grant of this requested temporary authority, remote residents in Alaska may not have access to vital telemedicine services for additional months while we await grant of a permanent application.

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

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public interest.”³ A grant of this STA would allow GCI to expand critical services to over 12,900 western Alaskan residents over this license. Many, if not most, of these affected residents rely solely on GCI’s services for a link to the world outside of their remote villages. This is due in large part to the challenging nature of providing mobile service in Alaska. Such challenges include “its remoteness, lack of roads, challenges and costs associated with transporting fuel, lack of scalability per community, satellite and backhaul availability, extreme weather conditions, challenging topography, and short construction season.”⁴ GCI relies on the C-Band in order to provide its FSS operations, and has a very long history of providing C-Band satellite communications solutions in Alaska in ways that advance the satellite technology space in an effort to provide communications services in rural Alaska. In addition, the substantial public service record of GCI indicates that the company is committed to providing service to consumers in Alaska; and it has sought regular authority for such a license. Because GCI does not want service to its customers, including access to telemedicine services, to be implicated during the pendency of this request, it is also requesting this STA. Allowing a STA to permit GCI to provide service over the C-Band, for 60 days, would certainly be in the public interest. This continued service illustrates a “compelling reason” to expeditiously grant the requested STA.

³ 47 C.F.R. §25.120(b)(1).

⁴ *Connect America Fund; Universal Service Reform – Mobility Fund; Connect America Fund - Alaska Plan*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139, 10162, ¶ 72 (2016) (“*Alaska Plan R&O*”) (citing *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17829, ¶ 507 (2011) (“*USF/ICC Transformation Order*”), *aff’d sub nom. FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014)).

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In addition, GCI's proposed construction of the earth station antenna as detailed in this application does not require FAA notification prior to construction pursuant to the FCC's rules, as the antenna height will be under 6.10 meters or 20 feet.⁵

⁵ See 47 C.F.R. § 17.7.