

**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”), 47 C.F.R. § 25.120, Alaska Communications Internet LLC (“Alaska Communications Internet”) respectfully seeks 60-day special temporary authorization (“STA”), commencing on Thursday, June 30, 2022, to operate one remote earth station in Fort Yukon, Alaska, as part of its existing C-band very small aperture terminal (“VSAT”) network<sup>1</sup> during the pendency of its forthcoming application for long-term operating authority. Consistent with the *ACI Network License*, Alaska Communications Internet seeks to operate these new sites in portions on the C-band at fixed locations in Alaska while communicating with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position.

Grant of this STA will enable Alaska Communications Internet to provide critically needed broadband services to the Yukon Flats Health Center (the “YFHC”), a tribal health clinic operated by the Council of Athabascan Tribal Governments and the only provider of comprehensive healthcare services in Fort Yukon. These broadband services will be supported by the Telecommunications Program of the Commission’s Rural Health Care (“RHC”) Universal Service Support Mechanism, and therefore, must begin operating by June 30, 2022. That is the last day of the current RHC Funding Year and, more importantly, marks the last day of RHC support for the services provided by the YFHC’s former service provider. Grant of this STA by

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<sup>1</sup> See Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign E170205, and subsequent modification and amendment applications (“*ACI Network License*”).

that date will help ensure a seamless transition to Alaska Communications Internet with no interruption in the YFHC's broadband service, so that YFHC remains connected and fully able to deliver broadband-enabled healthcare services to the small Alaska Native bush community it serves.<sup>2</sup>

Alaska Communications Internet intends imminently to file an application to serve this Fort Yukon site under a regular authority, and therefore requests a 60-day STA, as permitted by Commission rules. Alaska Communication s Internet previously filed an application to modify the *ACI Network License* in July 2021, which remains pending with the Commission.<sup>3</sup> Alaska Communications Internet intends to amend or replace that application to include this Fort Yukon site as well.

## **I. Background**

Alaska Communications Internet is an affiliate of Alaska Communications Systems Group, Inc. ("Alaska Communications") which, through its subsidiaries, provides terrestrial wireline telecommunications and broadband-enabled services throughout Alaska as the largest incumbent local exchange carrier in the state.<sup>4</sup> 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.

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<sup>2</sup> 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, in some cases, terrestrial point-to-point microwave transport links to Anchorage, Fairbanks, or Juneau.

<sup>3</sup> See Alaska Communications Internet LLC, File No. SES-MOD-20210702-01010.

<sup>4</sup> 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).

The *ACI Network License* authorizes Alaska Communications Internet to operate a network of C-band satellite earth stations in order to provide satellite services to diverse users in remote locations in Alaska. Specifically, from its gateway hub in Anchorage, Alaska, the network currently serves the Alaska Native population of St. Paul Island, and the Tanadgusix Corporation (“TDX”), an Alaska Native corporation created pursuant to the Alaska Native Claims Settlement Act (“ANCSA”). In addition, the C-band VSAT network serves local businesses co-owned by the Bristol Bay Economic Development Corporation (“BBEDC”),<sup>5</sup> providing broadband connectivity that supports the local fishing and seafood industries, as well as a test site located in Anchorage, Alaska. This STA, and the associated Modification Application, will enable Alaska Communications Internet to extend this network to deliver the well-recognized benefits of broadband telecommunications and Internet services to additional sites in Alaska bush communities, including those supported by the Commission’s universal service programs.

## **II. Discussion**

This STA request seeks authority to operate one additional earth station at the YFHC site in Fort Yukon, Alaska, as part of the *ACI Network License*, communicating with EUTELSAT 115WB in portions of the C-band, as described herein. The YFHC site is located at geographic coordinates: 66° 34' 5.8" N, 145° 14' 41.6" W. Frequency coordination was completed successfully on June 22, 2022.

### **A. CPI SAT/GD Satcom/Prodelin Model 1385**

Alaska Communications Internet incorporates by reference (and attaches as an Exhibit to this STA) a draft FCC Form 312 Schedule B and Technical Appendix showing its

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<sup>5</sup> The BBEDC is a not-for-profit company whose mission is to promote economic growth and opportunities for residents of BBEDC’s member communities through sustainable use of the Bering Sea resources. See <http://www.bbedc.com>.

requested operating parameters for the Fort Yukon site, the results of its successful prior coordination, and a radiation hazard analysis. At this site, Alaska Communications Internet will operate a 3.8-meter GD Satcom Prodelin Model 1385 earth station, a successor to the Model 1383 that is currently licensed in the *ACI Network License* that also appears on the Commission's Approved Non-Routine Earth Station Antennas List ("Non-Routine Antenna List").<sup>6</sup> Although the Model 1385 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 terminals in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules.<sup>7</sup>

At the YFHC site, the earth station will be mounted on an existing gravel pad in a fenced area inaccessible to the general public. The 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,"<sup>8</sup> and thus they fall within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.<sup>9</sup> Accordingly, no environmental assessment is required as part of this application because each proposed site is categorically exempt under Section 1.1306 of the Commission's rules, 47 C.F.R. § 1.1306.

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<sup>6</sup> See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>; Intelsat LLC, File No. SES-LIC-20110627-00745, Call Sign E110100; Escapes Network LLC, File No. SES-LIC-20110802-00906, Call Sign E110109.

<sup>7</sup> See 47 C.F.R. § 25.218(d).

<sup>8</sup> 47 C.F.R. § 1.1307(a)(4).

<sup>9</sup> 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 and the forthcoming application for regular authority, which was completed on June 22, 2022. 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 stations at the YFHC site.

As demonstrated in the frequency coordination report, there is no potential for interference by Alaska Communications Internet with the operations of other users of the C-band spectrum. Micronet received no objections in response to its Prior Coordination Notice and did not otherwise identify any potential for harmful interference under the Commission’s rules. Alaska Communications Internet will coordinate any additional 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 June 30, 2022. Further, Alaska Communications Internet believes this application involves “extraordinary circumstances” (*i.e.*, the delivery of critical broadband services supported by the Commission’s RHC Telecommunications Program to a tribal health clinic in the Alaska bush during a pandemic), and requests that the Commission authorize operations under this STA at the

earliest practicable time.<sup>10</sup> 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 stated above, Alaska Communications Internet intends imminently to file an application for regular authority to operate the YFHC site as described herein.

Grant of this 60-day STA will strongly serve the public interest by allowing Alaska Communications Internet to provide broadband services to the YFHC, a tribal clinic in Fort Yukon, Alaska. Fort Yukon is a small remote Alaskan bush community of fewer than 600 people, primarily Gwich'in Alaska Natives, located on the Arctic Circle. Continuity of the clinic's broadband service after the June 30, 2022 end of the current RHC funding year is essential to ensure that the people of Fort Yukon will continue to have access to critical broadband-enabled healthcare services. Only through a prompt grant of this STA request, by Thursday, June 30, 2018, can Alaska Communications Internet meet that need.

The proposed operations will greatly advance the public interest goals of the RHC support mechanism, as mandated by Sections 254(h)(1)(A) and 254(h)(2)(A) of the Communications Act, 47 U.S.C. §§ 254(h)(1)(A), (h)(2)(A) and numerous Commission orders.<sup>11</sup>

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<sup>10</sup> See 47 C.F.R. § 25.120(a). The Commission may authorize Alaska Communications Internet to commence operations under this STA sooner than three working days “upon due showing of extraordinary reasons for the delay in submitting the request which could not have been earlier foreseen by the applicant.” Given the strong public interest considerations described in this request, an expedited grant of this STA is warranted.

<sup>11</sup> *E.g. See Rural Health Care Support Mechanism*, WC Docket No. 02-60, Report and Order, FCC 12-150, 27 FCC Rcd 16678 (2012), at ¶ 342 (finding that “the RHC Telecommunications Program is particularly important for extremely remote places like Alaska”); Public Notice, “Federal Communications Commission Announces Final Set of Projects Selected for the Connected Care Pilot Program,” WC Docket No. 18-213, FCC 22-23 (rel. Mar. 17, 2022) (awarding support under the Connected Care Pilot Program to the Council of Athabascan Tribal Governments and the YFHC to enable delivery of “patient-based, Internet-connected remote monitoring, other monitoring, video visits, imaging diagnostics, remote treatment, and other services for veterans and low-income patients

The broadband-enabled telemedicine and telehealth services offered by YFHC are particularly important in the Alaska bush, where health clinics in small communities have limited resources patients may have no other options. Disproportionately, Alaska's bush villages are home to vulnerable communities of Alaska Natives, for whom these services are particularly critical. By directly supporting the YFHC, Alaska Communications Internet is helping to preserve life and enhance the health and well-being of these otherwise difficult-to-serve communities.

#### **IV. Conclusion**

Based on the foregoing, Alaska Communications Internet requests a grant of Special Temporary Authority to operate one earth station at the YFHC site as part of its C-band VSAT network in Alaska for a period of 60 days commencing on June 30, 2022, as described herein.

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with chronic conditions, high-risk pregnancy/maternal health, infectious diseases like COVID-19, mental health conditions, and opioid dependency [to] an estimated 5,588 patients, 95% of whom would be low-income and 5% of whom would be veterans”).