

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 begin to operate in the next 15 days, an emergency temporary fixed satellite service (“FSS”) earth station in the 3.7-4.2 GHz band (the “C-Band”) for 60 days or less, while awaiting the grant of its application for regular authority.² Specifically, GCI is seeking temporary authorization to install and operate a GD SatCom 2.4 meter 2244 Antenna (the “Station”) in Stony River, Alaska to communicate with Horizons 3E. 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 FCC’s rules. GCI’s operation of the Station will not cause harmful interference to surrounding networks, and as noted 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 satellite communications link that provides service to a healthcare customer in a remote area of Alaska. GCI has explored alternative solutions, but such deployments are not adequate in this area of Alaska to provide advanced telemedicine services. As a result, GCI seeks this emergency STA to permit it to begin construction on the new antenna as soon as possible due to the winter weather fast approaching this month.

² See IBFS File No. SES-LIC-INTR2022-03202 (IB2022003202), filed October 6, 2022 and Supplemental filed October 17, 2022.

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Granting this request for STA is necessary for GCI to provide reliable communications services for telemedicine applications to the Yukon Kuskokwim Health Corp (YKHC), 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 the YKHC Stony River Clinic to use new and more advanced telemedicine applications. GCI seeks this STA during the pendency of a request for permanent authority, 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 a number of potential options to provide this connectivity, including continued use of existing Ku-Band VSAT stations, which are already licensed under GCI's blanket Ku-Band authorization, and utilizing new or existing fiber infrastructure, however these deployments do not provide an adequate solution in this area of Alaska. For instance, Ku-Band is not an adequate solution because of the mountainous terrain and distance from a GCI Earth Station. As a result, GCI's best remaining option is to seek this emergency STA to utilize the above-referenced antenna on C-Band spectrum, as well as to seek 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 public interest."³ A grant of this STA would allow GCI, through its customer YKHC Stony River Clinic, to provide critical increased bandwidth services to Alaskan residents at the village

³ 47 C.F.R. §25.120(b)(1).

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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. GCI's substantial public service record 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 interrupted during the pendency of the regular request, it is also requesting this STA. Granting an 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.

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

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)).

⁵ See 47 C.F.R. § 17.7.