Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Application of Alaska Communications Internet LLC to Amend a Pending Application to Modify its C-Band Very Small Aperture Terminal Network License	))))	Call Sign: E170205 File No. SES-STA-2022____-_____

REQUEST FOR SPECIAL TEMPORARY AUTHORITY (YAKUTAT)

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 **Wednesday, November 23, 2022,** to operate a replacement 2.4-meter antenna in Yakutat, Alaska, as described in its pending application for regular license authority at that site filed on November 9, 2022, SES-AMD-INTR2022-03694, Submission ID No. IB2022003694. Alaska Communications Internet intends to use the replacement antenna to provide middle mile backhaul for voice and broadband services supporting businesses and residents in and around the community of Yakutat. While operating under this STA, Alaska Communications Internet intends to use portions on the C-band to communicate with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position.

Grant of this STA will enable Alaska Communications Internet to improve the reliability of voice and Internet access services in and around Yakutat, Alaska. Today, the existing backhaul suffers from reliability issues that are expected to worsen as the harsh Alaska winter deepens. This STA, in conjunction with its pending application for long-term operating authority, will enable deployment of new, more reliable primary middle mile backhaul connectivity to serve Yakutat and the surrounding areas.

I. Background

Alaska Communications Internet provides critically important broadband and voice-over-Internet Protocol ("VoIP") services to enterprise, business, educational, health care, and residential customers throughout the state. Its affiliates include the largest incumbent local exchange carriers in the state, providing telecommunications services in Anchorage, Fairbanks and Juneau, in addition to dozens of Alaska's rural and remote bush communities.[1]

The 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 well as to provide telephone and broadband communications backhaul services connecting telephone central offices operated by Alaska's small and rural telephone companies.

II. Discussion

Under this STA request, Alaska Communications Internet proposes to operate a new 2.4-meter antenna at the following site:

1. Yakutat
General Dynamics Prodelin Model 1241 (2.4 meter)
(geographic coordinates: 59° 33' 0.0" N, 139° 43' 48.0" W)

[1] 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).

Alaska Communications Internet incorporates by reference (and attaches as an Exhibit to this STA) the Form 312 Schedule B and Technical Appendix filed with its pending application for regular license authority at this site, which show its requested operating parameters at the Yakutat site, the results of prior coordination, and a radiation hazard analysis.

This 2.4-meter General Dynamics Prodelin Model 1241 antenna has been previously authorized at various other sites under the License. It is electrically identical to the Model 1244 and other Series 124 Prodelin antennas that appear 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 Bureau.[2]

This earth station will be mounted on the roof of an existing building or on a previously installed pole or pad in an 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,"[3] and thus falls within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.[4] 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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2 *See* Approved Non-Routine Earth Station Antennas, https://www.fcc.gov/approved-non-routine-earth-station-antennas.

3 47 C.F.R. § 1.1307(a)(4).

4 *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 Application. 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 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 report, there is no potential for interference into other users of the C-band spectrum sought herein by Alaska Communications Internet. Alaska Communications Internet currently operates its network with no reported cases of interference and will continue to coordinate any additional hub or remote operations prior to bringing them into use as part of the C-band VSAT network.

C. Public Interest Considerations

Grant of this application will strongly serve the public interest by expanding the availability of affordable broadband services and thereby provide enhanced economic growth and development opportunities in Alaska.[5] In general, the earth station proposed in this Application represents another step toward fulfilling the Commission's vision of universal availability of broadband. As the Commission reiterated in late 2019:

> Broadband access is critical to economic opportunity, job creation, education and civic engagement. That is why closing the digital divide is the Commission's top priority. For communities throughout our nation to thrive and prosper, their residents must have the option to obtain high-speed Internet access.[6]

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[5] *See generally Connect America Fund,* WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd 17663 (2011) ("*Transformation Order*").

[6] *Rural Digital Opportunity Fund*, WC Docket No. 19-126, Notice of Proposed Rulemaking, FCC 19-77 (rel. Aug. 2, 2019), at ¶ 1.

At this specific site, Alaska Communications Internet will provide critically needed backhaul transport services to improve the community's middle mile connectivity and help ensure no lapse in critical broadband and other communications services to residents and local businesses. A grant of this application will thus contribute greatly to the regional well-being of the City and Borough of Yakutat by helping to improve access to the information resources, as well as educational, healthcare, cultural, and economic opportunities available through broadband connectivity.

This STA is needed because the existing backhaul has reliability issues that are expected to increase as the Alaskan winter deepens, and the new earth station will provide more reliable service at this most critical time of the year. Subject to a grant of this STA, Alaska Communications has put air transport arrangements in place for the necessary personnel and equipment, so that the earth station may be installed and begin operating on November 28, 2022, immediately after the Thanksgiving holiday. Safety of winter travel in Alaska is highly dependent on weather conditions, so it is very important that this STA be in place to allow completion of this work on that schedule, or as soon thereafter as conditions permit.

III. Conclusion

For the foregoing reasons, Alaska Communications Internet requests that the Commission grant this request for special temporary authority to operate a 2.4-meter earth station at the Yakutat site, as described herein.