

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
Application of Alaska Communications	)	Call Sign:
Internet LLC for a 60-Day Special	)	
Temporary Authorization	)	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”) respectfully seeks a further 60-day special temporary authorization (“STA”), commencing on **Friday, December 10, 2022**, to continue operating seven remote earth stations in the Lower Yukon School District (“LYSD”), Alaska, as part of its existing C-band very small aperture terminal (“VSAT”) network¹ during the pendency of its application for long-term operating authority at these sites, SES-AMD-20220929-01044 (filed Sept. 29, 2022). Alaska Communications Internet seeks to continue operating these sites in communication with EUTELSAT 115WB, located at the 114.9° W.L. orbital position.

A grant of this STA will enable Alaska Communications to continue delivering critically needed broadband services to students, teachers, and staff of the LYSD under a commitment of support from the Emergency Connectivity Fund (“ECF”). The ECF is an FCC program that assists schools and libraries support remote learning and close the homework gap in the wake of the COVID-19 pandemic. These services advance the purpose of the ECF in rural and remote areas of the Alaska Bush by helping to bridge the digital divide in some of the nation’s most isolated communities.

¹ See Alaska Communications Internet LLC., File No. SES-LIC-20171116-01257, Call Sign E170205, and subsequent modification and amendment applications (“*ACI Network License*”). The LYSD sites are currently operating under a previous grant of special temporary authority, SES-STA-20220929-01043, which will expire on Dec. 10, 2022.

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.²

The *ACI Network 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, 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

This STA request seeks authority to continue operating seven earth stations in the LYSD, as part of the *ACI Network License*, communicating with EUTELSAT 115WB in portions of the C-band, as described herein. The seven additional sites are as follows:

1. **Hooper Bay School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 61° 31’ 19.24” N, 166° 5’ 47.53” W)

² 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).

2. **Mountain Village School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 62° 5' 20.62" N, 163° 43' 41.33" W)
3. **Emmonak School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 62° 46' 43.73" N, 164° 31' 48.13" W)
4. **Alakanuk School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 62° 41' 5.32" N, 154° 40' 9.57" W)
5. **Scammon Bay School**
General Dynamics Prodelin Model 1240-3422 (2.4 meter)
(geographic coordinates: 61° 50' 20.49" N, 165° 33' 59.41" W)
6. **Pilot Station School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 61° 56' 10.74" N, 162° 53' 31.19" W)
7. **Russian Mission School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 61° 47' 10.01" N, 161° 19' 33.84" W)

Alaska Communications incorporates by reference (and attaches as an Exhibit to this STA) the Form 312 Schedule B and Technical Appendix filed with its request for regular authority at these sites, SES-AMD-20220929-01044, showing the requested operating parameters at the LYSD sites, the results of prior coordination, and a radiation hazard analysis.

At each site, Alaska Communications Internet will operate a 2.4-meter General Dynamics earth station with a Prodelin antenna, which is electrically identical to the Model 1241 and 1244, which appear on the Commission's Approved Non-Routine Earth Station Antennas List ("Non-Routine Antenna List") and has been previously authorized at various sites under E170205. Moreover, Alaska Communications Internet will operate the earth stations below the maximum EIRP spectral density ("ESD") levels previously approved by the Bureau.³

³ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>.

At each site, the 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. In each case, 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,”⁴ and thus falls within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.⁵ 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.

A. Frequency Coordination

Alaska Communications Internet engaged Micronet Communications, Inc. (“Micronet”) to perform frequency coordination in support of this modification 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 reports, there is no potential for the proposed operations at these sites to interfere with other users of the C-band, and Alaska Communications has limited its frequency operations as-needed to accommodate other authorized spectrum users. Alaska Communications Internet currently operates its network, including these sites under the prior STA grant, with no reported cases of interference and will continue to coordinate any additional hub or remote operations prior to bringing them into use.

⁴ 47 C.F.R. § 1.1307(a)(4).

⁵ 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. Public Interest Considerations

Grant of this application will strongly serve the public interest by permitting Alaska Communications to continue its existing operations at these sites while its application for regular authority is pending. The services enabled by these operations expand the availability of affordable broadband services and thereby provide enhanced economic growth and development opportunities in Alaska.⁶ In general, these earth stations represent 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.⁷

These specific sites also advance the vision underlying the ECF, which Chairwoman Rosenworcel called "the largest single effort in our nation's history to make sure students have access to the broadband and devices they need for school. It will help close the Homework Gap so that kids who have been locked out of the virtual classroom can go online for class and do their nightly schoolwork."⁸ These earth stations therefore improve educational and economic opportunities, help close the digital divide, and enhance the wellbeing of the communities they serve.

A grant of special temporary authority is particularly critical here, given that the underlying services are supported by the ECF. Recognizing that "Congress has directed us to act with haste," and as directed in the statute, the Commission completed its rulemaking to implement the ECF mechanism within 60 days after enactment of the American Rescue Plan

⁶ 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*").

⁷ *Rural Digital Opportunity Fund*, WC Docket No. 19-126, Notice of Proposed Rulemaking, FCC 19-77 (rel. Aug. 2, 2019), at ¶ 1.

⁸ *ECF Program Order*, Statement of Acting Chairwoman Jessica Rosenworcel.

Act.⁹ With the school year already underway, time is of the essence in delivering these critically needed services. More specifically, grant of this application will allow Alaska Communications to continue providing LYSD with broadband connections that promote high-quality education and close the Homework Gap. This connectivity will support the schools and its teachers in fostering the growth and education of Alaska's children attending school in the LYSD, including those from pre-kindergarten to twelfth grade.

III. CONCLUSION

For the foregoing reasons, Alaska Communications Internet requests that the Commission grant this request for special temporary authority to continue operating seven earth stations that serve the Lower Yukon School District, as described herein.

⁹ *Id.* at ¶ 13.