

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

In the Matter of

Application of Alaska Communications	)	Call Sign: E170205
Internet LLC to Amend a Pending	)	
Application to Modify its C-Band Very	)	File No. SES-STA-2023____ - _____
Small Aperture Terminal Network License	)	

REQUEST FOR SPECIAL TEMPORARY AUTHORITY
(YAKUTAT and LOWER YUKON SCHOOL DISTRICT)

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 at the earliest possible date, to continue operating (1) one replacement 2.4-meter antenna in Yakutat, Alaska, as described in its pending application for regular license authority at that site, File No. SES-AMD-20221110-01253; and (2) seven remote earth stations in the Lower Yukon School District (“LYSD”), Alaska, again during the pendency of its application for long-term operating authority at these sites, SES-AMD-20220929-01044 (filed Sept. 29, 2022). In each case, these sites will operate as part of the existing Alaska Communications Internet C-band very small aperture terminal (“VSAT”) network license.¹

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 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 (the “License”). See also previous grants of special temporary authority, SES-STA-20230119-00071 (Yakutat) and SES-STA-20221205-01310 (LYSD).

At the Yakutat site, Alaska Communications Internet is using the replacement antenna to provide reliable middle mile backhaul for important voice and broadband services supporting businesses and residents in and around the community of Yakutat. The previous backhaul suffered from reliability issues that would only have worsened while the application for regular authority remains pending.

In each case, while operating under this STA, Alaska Communications Internet will use portions of the C-band to communicate with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position.

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 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

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).

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 continue operating C-band earth stations at the following sites:

1. **Yakutat**
General Dynamics Prodelin Model 1241 (2.4 meter)
(geographic coordinates: 59° 33' 0.0" N, 139° 43' 48.0" W)
2. **Hooper Bay School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 61° 31' 19.24" N, 166° 5' 47.53" W)
3. **Mountain Village School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 62° 5' 20.62" N, 163° 43' 41.33" W)
4. **Emmonak School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 62° 46' 43.73" N, 164° 31' 48.13" W)
5. **Alakanuk School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 62° 41' 5.32" N, 154° 40' 9.57" W)
6. **Scammon Bay School**
General Dynamics Prodelin Model 1240-3422 (2.4 meter)
(geographic coordinates: 61° 50' 20.49" N, 165° 33' 59.41" W)
7. **Pilot Station School**
General Dynamics Prodelin Model 1240 (2.4 meter)
(geographic coordinates: 61° 56' 10.74" N, 162° 53' 31.19" W)
8. **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 Internet incorporates by reference (and attaches as an Exhibit to this STA) the Form 312 Schedule B and Technical Appendix filed as Exhibits to its two pending applications for regular license authority covering these sites. Those documents show its requested operating parameters, the results of prior coordination, and a radiation hazard analysis.

The 2.4-meter General Dynamics Prodelin Model 1241 earth station at the Yakutat site 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") and have been previously authorized at various sites under E170205. Similarly, the 2.4-meter General Dynamics Prodelin Model 1240 earth station at the LYSD sites is electrically identical to the Model 1241. In each case, Alaska Communications Internet will operate the earth stations below the maximum EIRP spectral density ("ESD") levels previously approved by the Bureau.³

These earth stations 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,"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.

B. Frequency Coordination

Alaska Communications Internet engaged Micronet Communications, Inc. ("Micronet") to perform frequency coordination in support of this Application. Pursuant to Sections

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

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.").

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 stations.

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.

C. Public Interest Considerations

Grant of this application will strongly serve the public interest. 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

This Application represents another step toward fulfilling the Commission's vision of universal availability of broadband.

At the Yakutat site, this STA will support expanded availability of affordable broadband services in and around Yakutat, thereby providing enhanced economic growth and development opportunities in Alaska.⁷ This STA is needed because the pre-existing backhaul had reliability issues, and the new earth station provides more reliable service in the harsh Alaskan winter.

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

⁷ *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*").

At this specific site, Alaska Communications Internet is providing 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.

The LYSD sites 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 will 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 Act.⁹ With the school year well underway, 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.

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

⁹ *Id.* at ¶ 13.

III. Conclusion

For the foregoing reasons, Alaska Communications Internet requests that the Commission grant this request for special temporary authority to continue operating these eight 2.4-meter earth stations, as described herein.