

**GCI Communication Corp.
Application for Renewal of Special Temporary Authority**

APPLICATION FOR RENEWAL OF 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”) requests a renewal of its special temporary authorization (“STA”)¹ to continue to operate, for 60 days or less pending a decision on its application for regular authority,² service via two fixed satellite service (“FSS”) earth stations in the 3.7-4.2 and 5.925-6.425 GHz bands (the “C-Band”).³ Specifically, GCI is seeking a continuation of its temporary authorization to provide service via 3.6 meter Scientific Atlanta 8136 antenna earth stations (the “Station”) located at Kotzebue, AK to communicate with Galaxy 18 and ANIK F3. The Station is an existing station, currently licensed to and owned by the Federal Aviation Administration (“FAA”). The site, call sign E960346, is currently part of the FAA Alaskan Satellite Telecommunications Infrastructure (ASTI) program, which links the Alaskan Air Route Traffic Control Center in Anchorage, Alaska with 64 FAA facilities throughout the region.⁴ This infrastructure provides Alaska with 90 percent of its inter-facility communications for critical, essential and routine air traffic control

¹ See IBFS File No. SES-STA-20190812-01044, granted Aug. 21, 2019 (the “STA”).

² See IBFS File No. IB2019003632.

³ GCI recognizes that there is a current freeze “on the filing of new or modification applications for FSS earth station licenses, receive-only earth station registrations, and fixed microwave licenses in the 3.7-4.2 GHz frequency band.” The freeze on commercial C-band earth station activities does not apply to (a) STA requests for FSS earth station licenses in the C-Band and (b) the operations at issue given their longstanding DBE status. A renewal of the STA will allow GCI to provide ongoing service via the Station solely to the FAA that would not change the status quo in terms of earth station operations in the C-Band. Operations would be limited to FAA services. Out of an abundance of caution, if this STA request is considered a filing prohibited by this freeze, GCI respectfully requests a waiver of the freeze, as a grant of this STA request would “serve the public interest and not undermine the objectives of the freeze.” See *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band, 90 Day Window to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band*, Public Notice, 1, 3, DA 18-398 (rel. Apr. 19, 2018).

⁴ See L3Harris, Alaskan Satellite Telecommunications Infrastructure (ASTI) <https://www.harris.com/solution/alaskan-satellite-telecommunications-infrastructure-asti> (last visited Oct. 14, 2019).

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services supporting commercial aviation.⁵ This includes communications for commercial airline service in Alaska, commercial international over the pole flights, as well as commercial international flights to the Asia-Pacific. GCI requests a renewal of this STA in order to continue to support these critical U.S. aviation communications in Alaska.

GCI initially requested an STA for a period not to exceed 60 days pursuant to 47 C.F.R. §25.120(3) in order to provide critical services while allowing GCI enough time to complete necessary regulatory processes required by an application for permanent authority. As GCI previously explained, its operation of this Station does not cause harmful interference into surrounding networks, and there are extraordinary circumstances that continue to support the 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. An STA remains necessary for GCI to provide critical telecommunications services in rural Alaska exclusively to the FAA. As documented in Attachment A to the initial STA, the FAA migrated this site from the FAA-owned satellite infrastructure to commercial satellite services provided by L3Harris Technologies and its carrier partners. As documented in Attachment B to the initial STA, L3Harris Technologies chose GCI as its carrier partner to provide C-Band satellite communications services at designated locations in Alaska as part of the FAA's ASTI program. The migration from the FAA infrastructure to GCI has successfully occurred, and the continuity of service at this time is imperative. GCI filed an application for regular authority of the Station during the initial term of the STA,⁶ and now seeks a renewal of the STA during the pendency of that application. Without a grant of this requested temporary authority, GCI will be unable to

⁵ *Id.*

⁶ *See infra* n. 2.

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continue to support ongoing critical U.S. aviation communications in Alaska. This includes not only domestic flights, but also critical communications for international over the pole (North Pole) flights, as well as international flights to the Asia-Pacific.

GCI's request for a renewal of its STA at this location and for this service continues to qualify as "extraordinary circumstances requiring temporary operations in the public interest," for which "delay in the institution of these temporary operations would seriously prejudice the public interest."⁷ A grant of this request would allow GCI to continue to provide critical services to the FAA over this license as it has done during the initial term of the STA. The FAA's ASTI program relies on GCI's services to support critical aviation communications in some of the most rural portions of the country, linking pilots to the world outside of their remote location.

Granting a renewal of the STA to GCI to continue to provide service over the C-Band, for 60 days or less pending a decision on its application for regular authority, would certainly be in the public interest. Continuing to provide critical service to the federal government, and specifically the FAA, is a direct life safety issue for proper aircraft separation and control: for instance, the service provided by GCI at this site enables pilots to communicate with one another and air traffic controllers to prevent collisions, accidents, and to preserve human life. This need for this continued service illustrates a "compelling reason" to grant the requested STA extension.

⁷ 47 C.F.R. §25.120(b)(1).