

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

In the Matter of

Application of Alaska Communications) Call Sign: E170205
Internet LLC for 60-Day Special Temporary)
Authorization (“STA”)) 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”),¹ Alaska Communications Internet LLC (“Alaska Communications Internet”) respectfully seeks 60-day special temporary authorization (“STA”), commencing on Monday, March 30, 2020, to operate a new remote earth station site in Red Dog Mine, Alaska, as part of its existing C-band very small aperture terminal (“VSAT”) network.² Alaska Communications Internet will operate the additional site to support Teck Resources Limited’s (“Teck’s”) zinc mining operations in the remote Northwest Arctic Borough of Alaska. Alaska Communications Internet seeks to communicate at the new site with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position. Alaska Communications Internet also intends to file an application in the near future to modify the *ACI Network License* to operate this site on regular authority as part of its C-band VSAT network.

Grant of this STA request will serve the public interest because it will enable Alaska Communications Internet to deliver business-critical broadband services to support Red Dog Mine operations. Red Dog Mine has the world’s largest zinc reserves and is the world’s largest producer of the mineral. Teck, in partnership with NANA Regional Corporation, Inc. – an Alaska Native corporation created pursuant to the Alaska Native Claims Settlement Act (“ANCSA”) –

¹ 47 C.F.R. § 25.120.

² See Alaska Communications Internet LLC, File No. SES-LIC-20171116-01257, Call Sign E170205, and subsequent modification and amendment applications (“*ACI Network License*”).

leads the day-to-day operations at the mine and needs reliable connectivity services to support its operations, management and personnel, manage logistics and coordinate shipments. Under this STA, Alaska Communications Internet will provide telecommunications services to support the Teck-NANA partnership at Red Dog Mine, which has been a leader in indigenous hire for generations of local Alaska Bush community residents.³

I. Background

Alaska Communications Internet is an affiliate of Alaska Communications Systems Group, Inc. (“Alaska Communications”), a publicly-traded company that, through its subsidiaries, provides terrestrial wireline telecommunications and broadband-enabled services throughout Alaska as the largest incumbent local exchange carrier in the state.⁴ Alaska Communications Internet provides essential broadband and voice-over-Internet Protocol (“VoIP”) services to enterprise, business, educational, health care, and residential customers throughout the state.

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 (“E-rate”), rural health care providers supported by the Commission’s Rural Health Care Universal

³ Unlike Alaska’s three largest population centers, and the surrounding rural communities, Alaska Bush communities are isolated geographically from infrastructure resources commonly available elsewhere in the state, and the nation as a whole. Most Bush communities cannot be accessed by road, nor are they connected to the state’s power grid. To reach these communities, people, as well as goods and services, must arrive by plane, barge, snow machine, all-terrain vehicle, or other off-road transportation means. Communications services in these communities generally must rely on satellite or terrestrial point-to-point microwave transport links to Anchorage, Fairbanks, or Juneau.

⁴ 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).

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 Alaskan small and rural telephone cooperatives.

Alaska Communications Internet attaches as an Exhibit to this STA a *pro forma* FCC Form 312 Schedule B and Technical Appendix showing the details of its proposed earth station operations at the new site. Those documents provide relevant information relating to the earth station operating parameters, performance information, radiation hazard analysis and frequency coordination.

II. Discussion

This STA request seeks authority to operate one (1) remote earth station site in Alaska to communicate with the network hub operated by Alaska Communications Internet under the *ACI Network License* via the EUTELSAT 115WB satellite in the C-band.

A. New Site Location

Alaska Communications Internet seeks to operate the following site as part of its C-band VSAT network in Alaska under this STA:

- **Red Dog Mine**
General Dynamics Prodelin Model 1241 (2.4-meter)
(geographic coordinates: 67° 34' 39.78" N, 164° 3' 27.72" W)

At the Red Dog Mine site, Alaska Communications Internet will operate a 2.4m VSAT earth station that is authorized in the *ACI Network License* for similar fixed C-band operations and is on the Commission's Non-Routine Antenna List.⁵ Although the 2.4m earth station does not comply with the gain mask in Section 25.209 of the Commission's rules, Alaska Communications Internet demonstrates in the incorporated Schedule B that it will operate the

⁵ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>; e.g., Harris Corporation, File No. SES-LIC-20060302-00342, Call Sign E060075.

VSAT at maximum ESD levels below those currently authorized in the *ACI Network License* and in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules.⁶

Moreover, the earth station will be mounted on a previously installed pole in an area inaccessible to the general public. Its 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,"⁷ and thus they fall within the exemptions of Section 1.1306(a)-(b) and Note 1 to that rule.⁸ Accordingly, no environmental assessment is required as part of this application because the 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 STA request, which was completed on February 14, 2020. 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 on behalf of Alaska Communications Internet 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

⁶ See 47 C.F.R. § 25.218(d).

⁷ 47 C.F.R. § 1.1307(a)(4).

⁸ 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.").

Internet. Moreover, Micronet received no objections in response to its Prior Coordination Notices, and Alaska Communications Internet currently operates its network with no reported cases of interference. Alaska Communications Internet will coordinate any additional hub or remote operations prior to bringing them into use as part of the C-band VSAT network.

C. The C-Band Temporary Freeze Public Notice

Alaska Communications Internet acknowledges the Commission's Public Notice placing a temporary freeze on the filing of all new or modification applications for earth stations in the 3.7-4.2 GHz band, effective as of April 19, 2018.⁹ The *Temporary Freeze Public Notice* does not include a freeze on requests for special temporary authority for short-term operations, and thus the instant request is outside the scope of the freeze. Furthermore, grant of this STA will strongly serve the public interest by enabling business-critical broadband services and support for Red Dog Mine operations, where terrestrial connectivity is mostly unavailable.

The Commission recently adopted an Order terminating the freeze in Alaska, effective upon publication of the Order in the *Federal Register*.¹⁰ Alaska Communications Internet intends to file request for regular authority to operate at this site as part of the network licensed under its existing *ACI Network License* as soon as practicable after that termination of the freeze takes effect.

⁹ See Public Notice, 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 the 3.7-4.2 GHz Band, DA 18-398 (rel. on April 19, 2018) ("Temporary Freeze Public Notice"). See also, Public Notice, GN Docket Nos. 17-183, 18-122, "International Bureau Announces 90-Day Extension of Filing Window, to October 17, 2018, to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band; Filing Options for Operators with Multiple Earth Station Antennas," DA 18-639 (rel. Jun. 21, 2018).

¹⁰ *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, GN Docket No. 18-122, Report and Order and Order of Proposed Modification, FCC 20-22 (rel. Mar. 3, 2020), at ¶ 149.

III. STA Request & Public Interest Considerations

Section 25.120(a) provides that an STA request should be filed at least three business days prior to commence of proposed operations. Here, Alaska Communications Internet has timely filed this 60-day STA request in accordance with that requirement. Moreover, Section 25.120(b)(2) states that the Commission may grant a temporary authorization for up to 60 days if the STA request has not been placed on public notice and the applicant plans to file a request for regular authority for the service. Alaska Communications Internet intends to file an application for regular authority prior to the expiration of this STA term, this STA request will ensure Alaska Communications Internet has appropriate authority during the Commission’s review of its forthcoming application for long-term operations at this site.

Grant of this 60-day STA will strongly serve the public interest by allowing Alaska Communications Internet to provide broadband services to support the largest remote zinc mining operation in the world and its employees, which include generations of Red Dog Mine residents. Moreover, Red Dog Mine is a small community in Northwest Alaska that is unable to be effectively served by terrestrial connectivity. The nearest fiber connectivity is at the Quintillion’s submarine cable landing station in Kotzebue, Alaska. The site is over 60 miles in a straight line from the Quintillion landing station. To reach that point, in addition to terrestrial fiber construction, it would likely require deployment of lengths of undersea cable and the associated cable landing stations needed to cross open stretches of the Chukchi Sea.¹¹

¹¹ For a detailed discussion of the challenges of constructing such facilities, *see* Brian “Butch” Webb and Zachary Casey, “Shore Approaches for Fiber Optic Cables in Arctic Construction,” *Underground Construction* (Mar. 2017) (discussing the specialized horizontal directional drilling (“HDD”) techniques required in the Arctic, because “the known risk from deep ice scour in shallow water would require burial depths that are unachievable with standard methods. Additionally, the large volume of material removed and the consequent stockpiling of the spoil presents an environmental problem in the Arctic that is not acceptable. The HDD technique eliminates this problem and can extend the shore

Construction of new terrestrial transport facilities to reach these communities, let alone scalable fiber optic connections, would be technically and logistically infeasible, and satellite connectivity is the only realistic option for this location.

More generally, grant of this STA request will allow Alaska Communications Internet to further expand its network, create improved additional competitive alternative for Alaska Bush businesses with little access to telecommunications connectivity, and help improve the competitive landscape in the Alaska Bush.

IV. Conclusion

Based on the foregoing, Alaska Communications Internet requests that the Commission grant authority to Alaska Communications Internet to operate this additional remote site as part of its C-band VSAT network in Alaska for a period of 60 days, as described herein.

approach further out to sea without the need for any sea bottom plowing or excavation of fragile arctic coastline.”), *available at*: <https://ucononline.com/magazine/2017/march-2017-vol-72-no-3/features/shore-approaches-for-fiber-optics-cable-in-arctic-conditions>; Environmental Assessment, TERRA Southwest Broadband Telecommunications Project (April 2011) (discussing logistical and environmental challenges of constructing telecommunications facilities in southwest Alaska and rejecting a 100% fiber alternative proposal), *available at*: <https://www.gc.noaa.gov/documents/alaska-eis.pdf>.