

**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”)<sup>1</sup> to continue to operate, for 60 days or less pending a decision on its modification application,<sup>2</sup> a temporary fixed satellite service (“FSS”) VSAT network system in the 12/14 GHz band (the “Ku-Band”). Specifically, GCI is seeking continuation of its temporary authorization to operate currently-licensed antennas associated with Call Sign E120191, IBFS File No. SES-LIC-2012092500484 (the “License”), under modified parameters consistent with those requested in IBFS File No. SES-MOD-20190725-00956 that allow it to communicate with a new satellite, Call Sign S2947, in order to obtain additional Ku-band satellite capacity.<sup>3</sup> GCI’s operation of this License does not cause harmful interference into surrounding networks, and as demonstrated below, there are extraordinary circumstances that continue to support the grant of these temporary operations which 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 continue providing reliable communications services, including critical telehealth services, to rural and remote hospitals and clinics in

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<sup>1</sup> See IBFS File No. SES-STA-20200116-00072 (filed Jan. 16, 2020); IBFS File No. SES-STA-20191111-01434 (filed Nov. 11, 2019); IBFS File No. SES-STA-20190826-01121 (filed Aug. 26, 2019) (the “Initial STA”).

<sup>2</sup> IBFS File No. SES-MOD-20190725-00956 (filed July 25, 2019) (the “Modification Application”).

<sup>3</sup> These modified parameters include, but are not limited to: (1) Addition of the GD Satcom/Prodelin 1385/1386/2385 3.8m antennas; (2) modifications to the power levels of the 2.4m antennas and the 3.8m antenna; (3) extension of the western azimuth limit of the 2.4m antennas to 230W, and (4) modifications to the Emission Designators, Carrier EIRP and EIRP Density. See Modification Application for further details.

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western Alaska on a new satellite that will accommodate GCI's growing network capacity needs, as spectrum for this growth is unavailable on GCI's existing Ku-band satellite.<sup>4</sup> Although GCI filed a modification application to the E120191 underlying license to reflect the modifications necessary to utilize the new satellite, that application is still pending FCC review, and has yet to be placed on Public Notice. GCI must continue to have access to this new satellite via the modified parameters in order to continue supporting customers and services under the Rural Health Care Program.

Here, "there are extraordinary circumstances requiring temporary operations in the public interest" and "delay in the institution of these temporary operations would seriously prejudice the public interest."<sup>5</sup> A grant of this renewal would continue to allow GCI to provide critical health communications services to remote and rural hospitals and clinics in western Alaska. GCI's services support the delivery of telemedicine services such as teleradiology, remote patient monitoring, medical network solutions, and live video-conferencing to customers in Alaska. GCI has witnessed firsthand the transformational benefits of telemedicine for health care delivery in Alaska. These services improve healthcare in areas that traditionally have few physicians and even fewer medical specialists in a variety of medical fields, including audiology, cardiology, dental, family medicine, neurosurgery, ophthalmology, pediatrics, psychiatry, and women's health. In most instances, GCI's network is the only way that rural Alaskans may gain access to such specialists. For example, without telepsychiatry services, residents seeking psychiatric care in many remote villages would either have to wait for a sporadic visit from a traveling psychiatrist, or would have to travel vast distances – usually at a prohibitively high cost

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<sup>4</sup> This service will provide high-availability supplements to terrestrial circuits.

<sup>5</sup> 47 C.F.R. §25.120(b)(1).

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– to seek the medical help that they needed. Neither of these options would likely be possible during the harsh long Alaskan winter. GCI’s network enables a patient to visit with a specialist remotely, via a remote village clinic, on their own schedule.

The substantial public service record of GCI indicates that the company is committed to providing service to consumers in Alaska. It has sought regular authority for the requested modifications to E120191. However, because GCI does not want these services to be implicated during the pendency of this request, it is also requesting a renewal of its STA. Continued service illustrates a “compelling reason” to expeditiously grant the requested renewal, and would certainly be in the public interest.