

TelAlaska Cellular, Inc.
201 E 56th Avenue
Anchorage, AK 99518

June 2, 2021

Marlene, H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: TelAlaska Cellular, Inc.
Call Sign: E210108 St. George Island Ak School
REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Dear Ms. Dortch:

Pursuant to Section 25.10 of the rules of the Federal Communications Commission (the “FCC” or “Commission”), TelAlaska Cellular, Inc. (“TelAlaska”) hereby respectfully seeks a 60-day special temporary authorization (“STA”), commencing on Wednesday, June 23, 2021, to operate a fixed satellite service remote earth station. TelAlaska seeks to operate a C-band transmit/receive earth station in St. George, Alaska (E210108). TelAlaska will operate this extremely remote site to provide critical middle mile backhaul support for its provision of school services to the Pribilof School District. Grant of this STA will serve the public interest and ensure needed communications services are provided to the schools in Alaskan Native community on St. George Island, in Alaska.

Providing mobile and broadband service to Alaska is particularly challenging. It is well

known that Alaska presents unique challenges in providing broadband services to its remote and rural population. Such challenges include “its remoteness, lack of roads, challenges and costs associated with transporting fuel, lack of scalability per community, satellite and backhaul availability, extreme weather conditions, challenging topography, and short construction season.”¹ Therefore, TelAlaska must utilize a variety of technologies in order to provide dependable services, and often must do so in innovative ways. This includes using FSS in conjunction with its terrestrial, mobile, and fixed wireless networks. TelAlaska relies on the C-band to provide communications services to rural Alaska. TelAlaska provides C-band telecommunications services throughout the State of Alaska ranging from the North Slope Borough to the Aleutian Islands; connecting back to its teleport located in Seward, Alaska. It currently provides C-band connectivity to the school on St Paul Island, which is nearby St George Island in the Bering Sea. These two islands are the principal islands of the four Pribilof Islands, almost 300 miles from Alaska’s mainland.

This request for a STA is particularly time sensitive because Pribilof School District very recently decided to re-open the school in St. George and awarded an E-rate schools and library contract to TelAlaska with an absolute start date of July 1, 2021. The school had been closed for several years due to its student count being below the required level to stay open. The school has now reopened and the Pribilof School District applied for and was approved for E-rate funding. TelAlaska submitted its application for a license On May 4, 2020 (SES-LIC-20210510-00785).

¹ *Connect America Fund; Universal Service Reform – Mobility Fund; Connect America Fund - Alaska Plan*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 10139, 10162, ¶ 72 (2016) (“*Alaska Plan R&O*”) (citing *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17829, ¶ 507 (2011) (“*USF/ICC Transformation Order*”), *aff’d sub nom. FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014)).

It was accepted on May 19, 2021. The 30-day public notice period started on May 19, 2021. TelAlaska is concerned that there will not be an adequate amount of time to go through the 30-day public notice, process and approve this application before the customer specified start up date of July 1, 2021. Grant of an STA would be appropriate in this case.

In addition to the facts presented above, grant request for expedited consideration is necessary for TelAlaska to provide reliable communications services to TelAlaska's E-rate Schools and Library customer and would serve the public interest. This Alaska C-band transmit/receive earth station allows TelAlaska to respond to the needs of its customer in an economic and efficient manner. It supports school access services much needed on extremely remote Alaska Native Lands far out in the Bering Sea. The Pribilof Islands are comprised of four islands, of which the two principal islands of Saint Paul and Saint George are approximately 47 miles apart in the frigid Bering Sea. The community of Saint George is a predominantly Aleut (with a small Eskimo and Indian population) community 750 air miles from Anchorage. Per the 2010 census it has a population of 102. This community is extremely remote and isolated. There is no road access. The community has a small airstrip, not large enough to handle commercial jets. Most of the transport of goods is by freighter or barge service. Extreme weather conditions are the norm in the Bering Sea. Winds considered hurricane force in the contiguous United States are common which directly impacts access by air and sea.

There are no terrestrial broadband middle mile facilities serving the Island. TelAlaska has reviewed alternative satellite bandwidth. Ku-Band VSAT stations are geographically not available in all markets, limiting broadband deployment opportunities. Access to Ka-Band is lacking and none of the major Ka HTS operators are planning any new satellites that will be able to serve Alaska in the next 5-7 years. Ka-Band is not proven in Northern part of Alaska and not viable near or above the Arctic Circle. The Ka-Band does not have the atmospheric penetration

capability of C-Band and is vulnerable to extended outages due to weather.

Conclusion

As noted above, granting TelAlaska's request for a STA for this C-Band transmit/receive Earth Station would permit TelAlaska to offer essential services to the only school on St. George Island. TelAlaska has no reasonable alternative, as the C-Band presents the only current economically viable option for providing such communications services to these villages on a going-forward basis as attempts to use microwave operations or the Ku-band have failed (*as noted above*). TelAlaska has a demonstrated need for this authorization to provide necessary services now and in the future. Accordingly, for good cause shown, TelAlaska requests grant of a 60-day STA consistent with the request for relief set forth herein.

Respectfully submitted,

TelAlaska Cellular, Inc.

A handwritten signature in black ink, appearing to read "Brett Carter", written in a cursive style.

Brett Carter
President and General Manager