

GCI Communication Corp.
Application for Special Temporary Authority

APPLICATION FOR 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”) is seeking a 60-day special temporary authorization (“STA”) commencing immediately,¹ to operate an emergency temporary fixed satellite service (“FSS”) earth station in the 3.7-4.2 GHz band and the 5.925-6.425 GHz band (together, the “C-Band”). Specifically, GCI is seeking temporary authorization to install and operate a 3.8 meter GD Satcom 2385 antenna earth station (the “Station”) in Kobuk, Alaska – and specifically at a local health clinic, the Maniilaq Clinic – to communicate with ALSAT and Eutelsat 115. Because GCI is requesting an STA for a period not to exceed 60 days pursuant to 47 C.F.R. §25.120(b)(3) and has already filed a request for regular authority for this service,² this application need not be placed on public notice and should be granted expeditiously pursuant to the rules. GCI’s operation of the Station will not cause harmful interference into surrounding networks, and as demonstrated below, there are extraordinary circumstances supporting the immediate 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.

¹ GCI submits that there are “extraordinary reasons . . . that could not have been earlier foreseen” that warrant a waiver of the three working day review period pursuant to 47 C.F.R. § 25.120(a). Here, GCI is seeking immediate support for its C-Band communications link that has proven to be susceptible to power outages suffered by the community. GCI has explored alternative solutions, but such deployments are not adequate or available in this area of Alaska. As a result, GCI seeks this STA to permit it to begin construction on a new antenna as soon as possible due to the fast approaching winter season.

² See IBFS File No. SES-LIC-20210707-01017 (initial application filed July 1, 2021); IBFS File No. SES-AMD-20210812-01399 (amendment filed Aug. 12, 2021).

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Grant of this request for STA is necessary for GCI to continue providing reliable communications services, including critical health and safety services, to the Maniilaq Clinic in Kobuk and would serve the public interest. GCI seeks this STA now so that it may construct the necessary equipment prior to onset of the winter season and accompanying harsh weather, which often begins in September in this area of Alaska.

The entire village of Kobuk is currently serviced by a single C-Band GCI earth station for communication services. As such, this earth station is also the single source of connection to the Clinic, which could pose a risk to life and safety should there be a substantial power or equipment failure at the existing station. This risk has recently become more apparent as Kobuk has suffered at least nine power outages since June of 2021, which is a substantial increase as compared to previous years. In addition, due to the increased demand for telehealth services, particularly due to the pandemic, the Clinic also requires significant capacity – that of which cannot be supported by the existing earth station. As a result, GCI has investigated its options, as detailed below, with respect to protecting network reliability to the Clinic, and determined that the solution is to seek authorization for operation of an earth station on the Maniilaq Clinic premises. The proposed Station will be able to handle the increased capacity demands and notably, the Maniilaq Clinic owns and maintains a generator with backup power that will support this new Station and allow this link to stay online and stable in the event of another power outage in the village. GCI envisions that this new Station will become the primary router for network connectivity at the Clinic and will add redundancy to the existing Kobuk earth station, which would then become the secondary link, thus mitigating risks associated with relying on a single source of network connectivity for the village.

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GCI does not have any alternatives to seeking this STA during the pendency of the license application. Due to the critical services at stake, GCI has examined a number of non-satellite options to support network connectivity in this village, including utilizing new or existing fiber infrastructure or microwave radio services; however, such options proved not to be adequate solutions in this remote area of Alaska.³ In addition, time is of the essence as the winter season is quickly approaching in Alaska, and GCI must construct and begin operations prior to the onslaught of winter weather. As a result, GCI's remaining option is to seek this STA to utilize the above-referenced antenna on C-Band spectrum, as well as to seek permanent authority for these operations. Without a grant of this requested temporary authority, the Maniilaq Clinic remains susceptible to power outages and/or unreliable service at the existing GCI earth station during the pendency of the license application, which presents a significant risk to the health and safety of the local residents in this remote community, particularly during the COVID-19 pandemic.

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."⁴ The Maniilaq Clinic relies solely on GCI's C-Band connectivity for critical

³ For instance, the distance between many of GCI's C-Band earth stations and fiber headends is vast, and long fiber runs in Alaska are not feasible solutions. In many areas, such fiber would run over the Arctic tundra and would need to be safeguarded against damage caused by the complex and changing structure of permafrost, which can range in thickness from a single meter to many hundreds of meters. These areas may also require submarine fiber, which would have to run across hundreds of miles of open arctic ocean and would need to be safeguarded against additional elements, including ice and rough sea floors. In addition, while GCI relies on its TERRA microwave radio system throughout the state, it has found that such microwave systems are particularly susceptible to extreme weather in these remote and rural areas, such as the freezing and icing that occur during the Alaskan winter and spring months (roughly anywhere from September to June) and result in significant damage to the microwave radio antennas and wave guides, leading to link degradation and service outages.

⁴ 47 C.F.R. §25.120(b)(1).

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telehealth services, including Voice-Over Internet Protocol (VoIP) calling, video teleconferencing, internal/private systems/records access, e-mail and other forms of communications. The demands for these services have substantially increased due to the COVID-19 pandemic, and continue to grow, necessitating the need for additional capacity. The C-Band is primary path of transmission for many rural areas of Alaska, including Kobuk, due in large part to the challenging nature of providing communications services in Alaska. 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.”⁵ The substantial public service record of GCI indicates that the company is committed to providing service to consumers in Alaska; and it has sought regular authority for such a license, in order to avoid encountering a situation such as this in the future. Because GCI does not want service to its customers, including access to emergency services, to be implicated during the pendency of this request, it is also requesting this STA. Allowing a STA to permit GCI to provide service over the C-Band, for 60 days, would certainly be in the public interest. This continued service illustrates a “compelling reason” to expeditiously grant the requested STA.

In addition, GCI’s proposed construction of the earth station antenna as detailed in this application does not require FAA notification prior to construction pursuant to the FCC’s rules, as the antenna height will be under 6.10 meters or 20 feet.⁶

⁵ *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)).

⁶ 47 C.F.R. § 17.7(e).