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By Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Alaska Communications Internet, LLC, Petition for Partial Waiver of Section 15.407(a)(3) of the Commission's Rules*, ET Docket No. 18-282

Dear Ms. Dortch:

This letter responds to certain questions raised by the staff of the Office of Engineering and Technology regarding the above-referenced waiver request.

First, Alaska Communications Internet, LLC ("Alaska Communications") clarifies that, in the near term, to serve customers living in the areas around Pleasant Valley, Alaska and along the Chena River northeast of Fairbanks, there are two towers in Pleasant Valley on which Alaska Communications seeks to operate fixed wireless base station radios under the applicable point-to-point rules governing effective isotropic radiated power ("EIRP") pursuant to this waiver. Those two towers are shown on the map provided as Appendix A to Alaska Communications' Petition for Waiver.¹ The first is located along Chena Hot Springs Rd, at latitude/longitude coordinates 64° 52' 53.3" N, 146° 57' 44.94" W. The second is located at along Anders Avenue in Pleasant Valley, Alaska, at latitude/longitude coordinates 64° 52' 41.83" N, 146° 52' 58.50" W.

To encompass these towers and provide flexibility, while ensuring that the waiver would not apply in close proximity to Fairbanks itself, Alaska Communications requested that the Commission grant a waiver for deployment "within a 40-mile radius of Chena Hot Springs, Alaska."² In response to a question from staff, Alaska Communications now clarifies that its intent was for the waiver to apply within a 40-mile radius of Chena Hot Springs Airport, located at latitude/longitude coordinates 65° 3' 6.93" N, 146° 2' 38.50" W. That point is approximately 30 miles east-northeast of the more distant of these two towers.

¹ *Alaska Communications Internet, LLC, Petition for Partial Waiver of Section 15.407(a)(3) of the Commission's Rules*, ET Docket No. 18-282, Petition for Partial Waiver of Alaska Communications Internet, LLC (filed Sept. 6, 2018), at appendix A.

² *Id.* at 1.

Similarly, in the near term, Alaska Communications seeks to operate fixed wireless base station radios under the applicable point-to-point rules governing effective isotropic radiated power (“EIRP”) pursuant to this waiver on four towers in the area around Ninilchik. These four towers are shown on the map provided as Appendix B to Alaska Communications’ Petition for Waiver.³ They are located, more precisely, as follows:

Address	Latitude	Longitude
15765 Garroute St., Ninilchik, AK 99639	60° 2’ 36.38” N	151° 40’ 15.87” W
17640 Sterling Hwy., Ninilchik, AK 99639	60° 00’ 39.82” N	151° 42’ 35.93” W
13873 Your Drive, Ninilchik, AK 99639	60° 04’ 12.92” N	151° 38’ 22.37” W
65405 Oil Well Rd., Ninilchik, AK 99639	60° 02’ 3.54” N	151° 38’ 15.34” W

To encompass these towers and provide flexibility, Alaska Communications requested that the Commission grant a waiver for deployment “within a 40-mile radius of . . . Ninilchik, Alaska.”⁴ In response to a question from staff, Alaska Communications now clarifies that its intent was for the waiver to apply within the sparsely populated, area within a 40-mile radius of the Ninilchik Airport, located at latitude/longitude coordinates 60° 1’ 12.41” N, 151° 35’ 22.57” W, which would encompass all four towers.

Second, in response to a question from staff, the 2.4 GHz band is unsuitable for this deployment. While the 2.4 GHz band might potentially enable coverage over a greater distance than the U-NII-3 band that Alaska Communications proposes to use here, the higher frequency of the U-NII-3 band for this application can support higher data rates, faster broadband service, and greater capacity. Furthermore, there are a greater number of devices in use today that operate only in the 2.4 GHz band, making that band relatively more congested and increasing the potential for interference. Given the Connect America Fund, Phase II broadband speed requirements that the Commission has ordered Alaska Communications to meet,⁵ only the 5 GHz band is suitable for this deployment.

³ *Id.* at Appendix B.

⁴ *Id.* at 1.

⁵ *See Connect America Fund*, WC Docket No 10-90, Order, FCC 16-143, 31 FCC Rcd 12086 (2016), at ¶ 11 (requiring deployment of broadband with a minimum speed of 10 Mbps downstream and 1 Mbps upstream, with additional reporting of locations that can achieve 25 Mbps downstream and 3 Mbps upstream).

Please direct any questions regarding this matter to me.

Very truly yours,

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