



Telecommunications Law Professionals PLLC

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September 3, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GCI Communication Corp.
Notice of Ex Parte Communication – *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*
GN Docket No. 18-122

Dear Ms. Dortch:

On August 29, 2019, Kara Azocar, Regulatory Counsel, Federal Affairs, of GCI Communication Corp. (“GCI”), along with Jessica Gyllstrom of Telecommunications Law Professionals PLLC, met with William Davenport, Chief of Staff and Senior Wireless and International Legal Advisor to Commissioner Starks. On September 3, 2019, Ms. Azocar and Ms. Gyllstrom met with Will Adams, Legal Advisor to Commissioner Carr. GCI’s presentations during the meetings were consistent with its previous statements on the record in this docket and in related proceedings.

Specifically, GCI provided background on its significant reliance on the C-Band due to the unique attributes of Alaska, including Alaska’s harsh weather, unique topography and federal land regulation. GCI explained that it uses the C-Band to provide a variety of critical services, including video programming and broadband services in rural and remote areas; long-distance and emergency communications; real-time information transmissions to the FAA; and distance-learning and telehealth services. GCI urged the FCC to recognize the unique role that the C-Band plays in Alaskan communications by excluding the State of Alaska from any future reallocation of the C-Band and incorporating the following protections for incumbent C-Band operations: (1) commitments from satellite operators and MVPD programmers each to maintain the status quo of Alaskan C-Band operations (i.e., access to the full 500 MHz of C-Band capacity and receipt of video programming via C-Band); (2) maintaining the full-band, full-arc coordination policy; and (3) reimbursement to Alaska earth station operators for any impacts to their operations as a result of the reallocation of the C-Band services, regardless of whether that occurs exclusively in the Lower 48.



Ms. Marlene H. Dortch
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Please direct any questions to the undersigned.

Sincerely,

/s/Jessica D. Gyllstrom

Jessica DeSimone Gyllstrom
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

Enclosure

cc (via email): William Davenport
 Will Adams

