

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<i>In the Matter of</i>	)	
	)	
Expanding Flexible Use of the 3.7 to 4.2 GHz Band	)	GN Docket No. 18-122
	)	
Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz	)	GN Docket No. 17-183 (Inquiry Terminated as to 3.7-4.2 GHz)
	)	
Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission’s Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3.7-4.2 GHz Band	)	RM-11791
	)	
Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Band Shared Between the Fixed Service and the Fixed Satellite Service	)	RM-11778
	)	

**REPLY COMMENTS OF ALASKA TELECOM ASSOCIATION ON  
EXPANDING FLEXIBLE USE OF THE 3.7 GHz TO 4.2 GHz BAND**

The Alaska Telecom Association (“ATA”) files reply comments in this proceeding pursuant to the Notice of Proposed Rulemaking (“NPRM”) issued by the Federal Communications Commission (“Commission”) on July 13, 2018<sup>1</sup>. ATA’s members include local exchange carriers, wireless providers, and internet service providers serving Alaskans with advanced voice, data and broadband service, including many of the most remote communities of Alaska. These Reply Comments express common concerns among ATA members.

The NPRM seeks to identify potential opportunities for additional terrestrial use - particularly for wireless broadband services - of 500 megahertz of mid-band spectrum between

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<sup>1</sup> Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122 Order and Notice of Proposed Rulemaking, FCC 18-91 (rel. July 13, 2018)

3.7-4.2 GHz (“C-Band”). The Commission, in this proceeding, pursues the joint goals of making spectrum available for new wireless uses while balancing desired speed to the market, efficiency of use, and effectively accommodating incumbent Fixed Satellite Service (FSS) and Fixed Service (FS) operations in the band<sup>2</sup>. Commenters expressed serious concerns with reallocation of C-Band spectrum.

The C-Band is currently allocated in the United States exclusively for non-federal use on a primary basis for FSS (space -to-earth) and FS.<sup>3</sup> Oftentimes C-Band is the only option to provide critical and important services to rural and remote areas within Alaska.<sup>4</sup> Comments of GCI and Alaska Communications Internet, LLC (“AC”)<sup>5</sup> exemplify Alaska’s reliance on satellite, especially the reliability and geographic reach of C-band.<sup>6</sup>

Small, rural carriers in Alaska remain extremely concerned about the continued availability of C-band spectrum because they are dependent on satellite technology. Many communities must rely exclusively on satellite technology for the provision of basic telephone service, telehealth, and distance learning. These communities are among the most remote in Alaska with no reasonable or foreseeable terrestrial network to replace C-band satellite access. Areas such as the Alaska Peninsula, Aleutian Chain, Yukon Flats, and eastern North Slope are examples of this. As C-band transport relies on a gateway earth station it is not sufficient to

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<sup>2</sup> NPRM at paragraph 2.

<sup>3</sup> 47 CFR 2.105, United States Table of Frequency Allocations, non-Federal Table for the band 3.7-4.2 GHz.

<sup>4</sup> GCI Comments at pages 2 (id)

<sup>5</sup> AC Comments at page 3 (C-band is essential to communications connectivity in remote areas of Alaska, and has no adequate substitute, either through terrestrial facilities or in other higher frequency satellite bands.)

<sup>6</sup> AC Comments at pages 10-11 (Because the states northerly latitude necessitates such low elevation angles, rain fade and physical obstructions also play an outsize role in the availability and reliability of FSS in Alaska.)

exempt remote communities without protection of the gateway sites. Satellite continues to play an essential role in keeping Alaska connected to the nationwide network.

The ATA supports the C-Band Alliance (“CBA”) call to exclude Alaska and Hawaii from transfer of spectrum.<sup>7</sup> The ATA agrees with AT&T Services, Inc. that the needs of non-contiguous regions of the United States are different and that reallocation in these areas may merit separate policy consideration.<sup>8</sup>

Commenters have made clear that satellite access, particularly C-Band spectrum, is vital in Alaska. An exemption from the Commission will enable thousands of consumers living in remote Alaska the opportunity to obtain an Internet connection that may otherwise be beyond their reach. This exemption will ensure that remote Alaskans continue to have appropriate access to broadband and other critical services.

The ATA respectfully requests the Commission to protect vital broadband services in Alaska and preserves the vital infrastructure which relies on C-Band spectrum.

Respectfully submitted,

/s/

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*December 11, 2018*

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<sup>7</sup> Ex Parte Letter from Jennifer D. Hindin, GN Docket Nos. 17-183, 18-122 (filed Oct. 17, 2018 at Attachment A).

<sup>8</sup> AT&T Services, Inc. Comments (Oct. 29, 2018) at fn6. (“Not only are the needs different in Alaska, Hawaii, Puerto Rico, and the U.S. protectorates, but the considerations governing the satellites with coverage that includes those areas may also be considerably different. Thus, AT&T agrees with CBA that both the basis for, and the factual background of, the non-CONUS regions may militate in favor of separate consideration.”)