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VIA ECFS

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

Re: Notice of Ex Parte Communication –*In the Matter of Amendment of the Commission’s Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354

Dear Ms. Dortch:

On September 17, 2015, Chris Nierman, Senior Counsel, Federal Affairs, General Communication, Inc. (“GCI”), and Kara Azocar, Regulatory Counsel, Federal Affairs, GCI, along with Michael Lazarus and Jessica Gyllstrom of Telecommunications Law Professionals PLLC, met with Paul Powell, Brian Regan, Becky Schwartz, Kamran Etemad, and Roger Noel of the Wireless Telecommunications Bureau (“WTB”) and Navid Golshahi and Robert Pavlak of the Office of Engineering and Technology (“OET”). Ira Keltz of OET also participated via teleconference. The presentation was consistent with previous GCI filings in the above-referenced proceeding, as supplemented below.

During the meeting, GCI stressed the importance of protecting incumbent 3700-4200 MHz band (“C-Band”) Fixed Satellite Services (“FSS”) earth stations from harmful interference by Citizen Broadband Radio Service Device (“CBSD”) and other end user device operations in the adjacent 3.5 GHz band. GCI explained that it has over 100 C-Band sites that assist in providing a vast array of critical services across Alaska. For instance, GCI offers Measured Toll Service “MTS” to remote Alaska villages. In many of these remote communities, services via FSS are the only option for connecting to emergency officials in critical situations. In addition, GCI delivers long-distance private line (special access) services to FAA and other critical government agency circuits using its C-Band FSS stations.

GCI’s C-Band FSS sites also play a significant role in providing telehealth and distance learning services to rural Alaska. ConnectMD is GCI’s telehealth service, which brings specialists and medical services to remote areas that could not otherwise receive such assistance. As detailed in GCI’s reply comments in this proceeding, the ConnectMD program offers medical network solutions, telehealth video service, and connectivity, allowing over 200 facilities to securely and reliably exchange health-related information. GCI’s SchoolAccess program provides broadband access, video conference, and state-of-the-art digital tools to provide high-quality content to students and library patrons in rural and underserved regions of Alaska.



GCI explained that the services it provides over the C-Band are especially critical to Alaska due to the remote geography and particularly inclement weather, which makes travel difficult, expensive, and oftentimes impossible. Interruption of these critical services could result in life-threatening situations. Therefore, GCI stressed that the FCC must take actions to protect these critical and important services in the C-Band. Consistent with GCI's reply comments, such actions should include (1) adopting interference criteria based on 1% of noise floor for out-of-band FSS protection, equal to an I/N of -20 dB; (2) adopting a default protection value based on a five degree minimum elevation angle; and (3) adopting at a minimum, a -40 dBm/MHz OOB limit at the upper edge of the 3.5 GHz Band.

Sincerely,

Michael Lazarus
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Paul Powell
Brian Regan
Becky Schwartz
Kamran Etemad
Roger Noel
Navid Golshahi
Robert Pavlak
Ira Keltz