

**From:** [Elizabeth Fishel](#)  
**To:** [O'Connor, Mary](#); [Blaise Scinto](#); [Charles Mathias](#); [Dana Shaffer](#); [Sean Spivey](#); [Kari Hicks](#); [John Schauble](#); [Stephen Buenzow \(CTR\)](#); [Paul.Mamud@fcc.gov](#); [Susan Mickley](#)  
**Cc:** [Conway, Sean](#)  
**Subject:** RE: Request for Emergency STA  
**Date:** Monday, March 30, 2020 10:41:20 AM

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REVISED VERSION

A:shiwi College & Career Readiness Center's request for emergency Special Temporary Authority (STA) to operate on unassigned 2.5 GHz spectrum, formerly Educational Broadband Service spectrum, specifically New Channel 1 (2502-2551.5 MHz), New Channel 2 (2551.5-2602 MHz) and New Channel 3 (2615-2616 MHz and 2673.5-2690 MHz) over the eligible rural tribal land of Zuni Reservation (as defined in the shape file located at <https://fcc.maps.arcgis.com/apps/webappviewer/index.html?id=4287bc078a5e4c7dbd291d78e0534ca7&extent=-109.718971804,34.3269955982,-108.35503723,35.5346777612>)

is granted via this email for a period of 60 days. A:shiwi College & Career Readiness Center will be using this spectrum to provide relief during the state of emergency caused by the spread of the coronavirus throughout the United States. This STA is authorized on a secondary non-interference basis. Operation under this STA must be consistent with the technical rules applicable to this spectrum. A:shiwi College & Career Readiness Center must cease operating on these frequencies if it causes harmful interference to any primary users, as well as at the expiration of this STA. Any structure utilized to operate pursuant to this STA must comply with the height limitations specified in Section 17.7 of the Commission's rules or must be registered with the FAA. A:shiwi College & Career Readiness Center must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (March 30, 2020). In addition, please email a courtesy copy of the STA application to the FCC staff members on this email. The mailing addresses for courier/messenger delivery and for delivery by the U.S. Postal Service are listed at the bottom of this email.

In granting this STA, the Wireless Telecommunications Bureau is relying on our understanding that A:shiwi College & Career Readiness Center is ready to deploy immediately and the representation that the Governor of the Zuni Tribal Council consents to the grant of this STA request over its reservation. Grant of this STA does not prejudice or impact the rights of any eligible entity to apply for unassigned EBS spectrum on the Zuni Reservation pursuant to the 2.5 GHz Rural Tribal Priority Window that is currently open, nor does it infer any rights to A;shiwi College & Career Readiness Center with regard to such Priority Window.

STA applications being delivered via a courier or by messenger service must be sent to the address below:  
Federal Communications Commission  
9050 Junction Drive  
Annapolis Junction, MD 20701

STA applications being delivered by the U.S Postal Service must be sent to the address below:  
Federal Communications Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

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**From:** O'Connor, Mary <moconnor@wbklaw.com>  
**Sent:** Thursday, March 26, 2020 10:43 AM  
**To:** Blaise Scinto <Blaise.Scinto@fcc.gov>; Charles Mathias <Charles.Mathias@fcc.gov>; Dana Shaffer <dana.shaffer@fcc.gov>; Sean Spivey <Sean.Spivey@fcc.gov>; Kari Hicks <Kari.Hicks@fcc.gov>; John Schauble <John.Schauble@fcc.gov>; Stephen Buenzow (CTR) <Stephen.Buenzow.CTR@fcc.gov>; Paul.Mamud@fcc.gov; Susan Mickley <Susan.Mickley@fcc.gov>; Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>  
**Cc:** Conway, Sean <SConway@wbklaw.com>  
**Subject:** Request for Emergency STA

All,

Attached is the A:shiwi College and Career Readiness Center request for an emergency STA to operate on the vacant EBS spectrum covering the Zuni Reservation. Please let me know if you have any questions or need anything else. Thank you for your efforts and support for the American public during this difficult time.



**Mary N. O'Connor**

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## REQUEST FOR EMERGENCY SPECIAL TEMPORARY AUTHORITY

A:shiwi College & Career Readiness Center (“ACCRC”) is requesting this emergency special temporary authority (“STA”) to operate on the unassigned Educational Broadband Spectrum (“EBS”) spectrum on the Zuni Reservation to facilitate and respond to the increased demand for wireless broadband services during the 2020 Coronavirus pandemic. Specifically, ACCRC is requesting authority to operate on New Channel 1 (2502-2551.5 MHz), New Channel 2 (2551.5-2602 MHz) and New Channel 3 (2615-2616 MHz and 2673.5-2690 MHz) over the Zuni Reservation. We are requesting the STA because of the impacts of the COVID-19 Pandemic locally, as the mandatory precautions authorized by the Governor of the State of New Mexico as well as the Governor of the Pueblo of Zuni has closed all educational institutions PreK-12 and higher education. In spite of the closures, educational programming is expected to continue via WiFi and other alternative electronic methods.

Due to the rural and isolated reservation environment, many community members do not have Internet at home. At this time, access to the Internet is critical. The STA will allow ACCRC to support students who live on the Zuni Reservation and are enrolled in higher learning courses from a number of partner colleges and universities, and the students enrolled in PreK-12 programs with the Zuni Public School District who do not have access to WiFi at home.

The availability of Internet access at home is essential for a number of important reasons: to enable students to maintain classwork and schedules as required. In addition, the STA will allow the community members to maintain communication with tribal leadership and programs regarding changes in mandatory COVID-19 requirements and other information during this time of crisis.

ACCRC requests this STA for a period of 60 days. ACCRC will comply with all service and technical rules associated with the EBS spectrum for the duration of the STA. ACCRC acknowledges that the grant of this STA is temporary and ACCRC will cease operations upon the termination of the STA. In addition, ACCRC acknowledges and agrees that grant of this STA provides no rights to the EBS white space spectrum that is available on the Zuni Reservation pursuant to the EBS Tribal Window that is currently open.

Attached please find a copy of an email provided by the Governor of the Zuni Tribal Council supporting the filing of this emergency STA request.

From: **Val Panteah** <[Val.Panteah@ashiwi.org](mailto:Val.Panteah@ashiwi.org)>  
Date: Wed, Mar 25, 2020 at 1:10 PM  
Subject: Special Temporary Authority - Wi-Fi  
To: Mariel Triggs <[mariel@muralnet.org](mailto:mariel@muralnet.org)>, Hayes Lewis <[Hayes.Lewis@ashiwi.org](mailto:Hayes.Lewis@ashiwi.org)>  
Cc: Charles England <[Charles.England@ashiwi.org](mailto:Charles.England@ashiwi.org)>, Carleton Bowekaty <[Carleton.Bowekaty@ashiwi.org](mailto:Carleton.Bowekaty@ashiwi.org)>, Bernadette Panteah <[Bernadette.Panteah@ashiwi.org](mailto:Bernadette.Panteah@ashiwi.org)>

Mariel,

The Zuni Tribal Council authorizes and supports the filing of the Special Temporary Authority (STA) by the A:shiwi College and Career Readiness Center. During this critical period, we feel that all Americans should be able to connect to the Internet for vital services and information. As such a time demands some diverse strategies, we ask that the Federal Communications Commission move expeditiously to grant this request to ensure the students of A:shiwi College and Career Readiness Center have broad band access during this pandemic.

The Pueblo of Zuni is located in a remote rural community with limited access to internet services and the STA would assist students whose families do not have internet or Wi-Fi capabilities, especially now that colleges and universities have decided to cancel classes except for on-line learning. Now that we have as the tribal government and the State of New Mexico issued stay at home orders, we feel that it is especially important for our students have access to Wi-Fi. Thank you

If you have any questions please let me know.

Governor Panteah