

## Connie Diaz

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**From:** Elizabeth Fishel  
**Sent:** Wednesday, August 19, 2020 12:06 PM  
**To:** jerrold baca; Dana Shaffer; Susan Mort; Charles Mathias; Connie Diaz; Cecilia Sulhoff; Blaise Scinto; John Schauble; Paul Malmud; Nadja SodosWallace; Jennifer Tomchin; Peter Daronco; Stephen Buenzow (CTR); Susan Mickley; Sommer Gilbert  
**Subject:** FW: Discussion of the STA request of The Pueblo of Santa Clara  
**Attachments:** Santa Clara Pueblo 2\_5GHZ STA REQUEST.PDF; DA-20-463.pdf

Good afternoon,

Shown below is the granted special temporary authorization (STA) that gives The Santa Clara Pueblo permission to operate according to the conditions specified in this STA.

Please feel free to contact me if you have any questions.

Elizabeth (Beth) Fishel

The Santa Clara Pueblo's request for emergency Special Temporary Authority (STA) to operate on unassigned 2.5 GHz spectrum, formerly Educational Broadband Service spectrum for a period of 60-days is granted via this e-mail. The Santa Clara Pueblo will be using this spectrum to provide relief during the state of emergency caused by the spread of the coronavirus throughout the United States.

The Santa Clara Pueblo may use New Channel 3 (2615-2616 MHz and 2673.5-2690 MHz) to transmit from sites within the Santa Clara Pueblo Reservation, as defined in the following shape file: <https://fcc.maps.arcgis.com/apps/webappviewer/index.html?id=4287bc078a5e4c7dbd291d78e0534ca7&extent=-106.498481784,35.8430196767,-105.940736104,36.1155929195>. 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. The Santa Clara Pueblo must cease operating at the expiration of this STA. In addition, the Santa Clara Pueblo must cease operating on these frequencies if such use causes harmful interference to any existing licensees. 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.

The Santa Clara Pueblo must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (August 19, 2020). The STA application must be filed in the Commission's Electronic Comment Filing System (ECFS) as a Non-Docketed Filing in the FCC Inbox for 1.931 Market-based STAs, pursuant to the process described in the attachment to DA 20-463, a copy of which is attached to this email. In addition, a courtesy copy of the STA application should be emailed to the FCC staff members copied on this email. If you have any questions about the filing process, please contact Paul Malmud of the Broadband Division at [Paul.Malmud@fcc.gov](mailto:Paul.Malmud@fcc.gov).

In granting this STA, the Wireless Telecommunications Bureau is relying on our understanding that the Santa Clara Pueblo is ready to begin operations promptly. Grant of this STA does not prejudice or impact the rights of any eligible entity to apply for unassigned EBS spectrum on the Santa Clara Pueblo Reservation pursuant to the 2.5 GHz Rural Tribal Priority Window that is currently open, nor does it infer any rights to the Santa Clara Pueblo Reservation with regard to such Priority Window.

Here is the 60 day letter as discussed. Apologies that I attached the wrong one.

Jerrold Baca  
Director of IT  
Santa Clara Pueblo Tribal Administration



# SANTA CLARA

POST OFFICE BOX 580  
(505) 753-7330  
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# INDIAN PUEBLO

ESPANOLA, NEW MEXICO  
87532  
OFFICE OF GOVERNOR

June 24, 2020

Federal Communications Commission  
Attention: Elizabeth Fishel, Wireless Bureau  
445 12th Street SW  
Washington, D.C. 20554  
RE: Santa Clara Pueblo STA Request

Dear Ms. Fishel:

## REQUEST FOR EMERGENCY SPECIAL TEMPORARY AUTHORITY

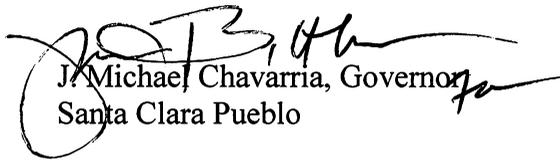
Santa Clara Pueblo "SCP" is requesting this emergency special temporary authority ("STA") to operate on the unassigned Educational Broadband Spectrum ("EBS") spectrum on the Santa Clara Pueblo Reservation to facilitate and respond to the increased demand for wireless broadband services during the 2020 Coronavirus pandemic. Specifically, SCP is requesting authority to operate on New Channel 3 (2615-2616 MHz and 2673.5-2690 MHz) over the Santa Clara Pueblo 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 Santa Clara has closed all educational institutions PreK-12 and higher education. In spite of the closures, educational programming is expected to continue via Wi-Fi 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 SCP to support students who live on the Santa Clara Pueblo 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 surrounding Public School Districts who do not have access to Wi-Fi 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 elders access to telehealth remote Doctor visits, reducing their exposure to COVID-19 and preserving valuable community history and knowledge. Community members will also be able to maintain communication with tribal leadership and programs regarding changes in mandatory COVID-19 requirements and other information during this time of crisis.

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

The Santa Clara Pueblo understands the following: 1) that our operation under the STA is a secondary and non-interference basis; 2) that the STA is temporary; and 3) agree that the Pueblo will cease operations upon the termination of the STA. Further, Santa Clara Pueblo acknowledges that a granted STA provides no right to the EBS spectrum that is available on the Santa Clara Pueblo Reservation pursuant to the Tribal Priority Window. Lastly, Santa Clara Pueblo also provides compliance assurance to honor the "Keeping Americans Connected Pledge".

  
J. Michael Chavarria, Governor  
Santa Clara Pueblo



# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

News Media Information 202 / 418-0500  
Internet: <https://www.fcc.gov>  
TTY: 1-888-835-5322

DA 20-463  
Released: April 29, 2020

## ELECTRONIC FILING NOW AVAILABLE FOR ALL LICENSE APPLICATIONS IN THE WIRELESS RADIO SERVICES

### *Mandatory Electronic Filing Will Be Enforced as of July 28, 2020*

By this Public Notice, the Wireless Telecommunications Bureau (WTB) announces 100% electronic filing capability for license applications in the Wireless Radio Services. The Bureau's Universal Licensing System (ULS) currently provides licensees and applicants electronic filing capability for the vast majority of applications in the Wireless Radio Services. There are a few limited categories of submissions that ULS has not been able to accept electronically, and until today, these had to be filed manually. These categories are: (1) Special Temporary Authority (STA) applications in certain market-based services, (2) sublease applications, and (3) multi-step transactions.

In an effort to provide a complete electronic filing solution to licensees and applicants, particularly considering the current pandemic due to COVID-19, WTB announces an ECFS non-docketed filing solution exclusively for the limited categories of applications referenced above. Instructions for how to complete non-docketed ECFS filings for this limited class of filings are attached to this Public Notice.<sup>1</sup>

Applicants may begin using ECFS to file their applications electronically effective **April 29, 2020**. A courtesy copy of any application(s) with an urgent filing deadline may be sent to [ULScc@fcc.gov](mailto:ULScc@fcc.gov). The ECFS solution will become mandatory for filers on **July 28, 2020**, and any manually filed applications delivered after 4 p.m. on **July 27, 2020** will be dismissed without prejudice. This creates a 90-day transition period, which we believe provides sufficient time to allow users to adjust to this new requirement and to familiarize themselves with the ECFS filing system.

**Mandatory Electronic Filing.** Section 1.913(b) requires electronic filing of all applications in the Wireless Radio Services (with limited exceptions).<sup>2</sup> Because ULS was previously unable to accept some limited categories of filings electronically, WTB routinely waived the electronic filing requirement for market-based STAs, sub-leases, and multi-step transactions. Now that electronic filing is available for these remaining categories, WTB will begin strictly enforcing the electronic filing requirement for them as of July 28, 2020. We waive the signature requirement of section 1.917(d) to the extent necessary to allow filing as described herein.<sup>3</sup>

For questions regarding this Public Notice, please contact Keith Harper, Mobility Division, Wireless Telecommunications Bureau, at (202) 418-2759; [Keith.Harper@fcc.gov](mailto:Keith.Harper@fcc.gov), or Paul Malmud, Broadband Division, Wireless Telecommunications Bureau, at (202) 418-0006; [Paul.Malmud@fcc.gov](mailto:Paul.Malmud@fcc.gov).

<sup>1</sup> In addition, WTB observes that non-licensees often seek waivers of rules in the Wireless Radio Services, and we provide a tailored ECFS filing capability for those requests as well to eliminate the need for paper filings.

<sup>2</sup> Similarly, section 1.931 requires electronic filing of special temporary authority applications. 47 C.F.R. §§ 1.913, 1.931.

<sup>3</sup> 47 C.F.R. § 1.917(d).

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