

Connie Diaz

From: Elizabeth Fishel
Sent: Friday, August 21, 2020 8:41 AM
To: chuck.reese@cskt.org; Dana Shaffer; Susan Mort; Blaise Scinto; John Schauble; Paul Malmud; Nadja SodosWallace; Jennifer Tomchin; Peter Daronco; Susan Mickley; Sommer Gilbert; Connie Diaz; Cecilia Sulhoff; Stephen Buenzow (CTR); Charles Mathias
Subject: FW: Special Temporary Authority
Attachments: FCC STA Signed.pdf; DA-20-463A1.pdf; Filing PN Attachment DA 20-463.pdf

Good morning,

Shown below is a grant of the emergency special temporary authorization issued to allow the Confederated Salish and Kootenai Tribes of the Flathead Nation to operate on EBS spectrum.

Please contact me if you have any questions.

Elizabeth (Beth) Fishel

The Confederated Salish and Kootenai Tribes of the Flathead Nation'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 Confederated Salish and Kootenai Tribes of the Flathead Nation 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 Confederated Salish and Kootenai Tribes of the Flathead Nation may 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 eligible rural tribal land of the Flathead Reservation (as defined in the shape file located at <https://fcc.maps.arcgis.com/apps/webappviewer/index.html?id=4287bc078a5e4c7dbd291d78e0534ca7&extent=-114.961616305,46.9301428197,-113.557114895,47.9600132203>). This STA is authorized on a secondary, non-interference basis. This STA does not authorize operation within the Geographic Service Area of any existing EBS license, including Stations WNC728 and WNC763 (Frenchtown School District #40), WNC761 and WNC764 (Florence-Carlton School District #15-6). Operation under this STA must be consistent with the technical rules applicable to this spectrum. The Confederated Salish and Kootenai Tribes of the Flathead Nation must cease operating at the expiration of this STA. In addition, the Confederated Salish and Kootenai Tribes of the Flathead Nation 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 Confederated Salish and Kootenai Tribes of the Flathead Nation must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (August 21, 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.

In granting this STA, the Wireless Telecommunications Bureau is relying on our understanding that the Confederated Salish and Kootenai Tribes of the Flathead Nation are 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 Flathead Nation Reservation pursuant to the 2.5 GHz Rural Tribal Priority Window that is currently open, nor does it infer any rights to the Confederated Salish and Kootenai Tribes of the Flathead Nation with regard to such Priority Window.

From: Chuck Reese <Chuck.Reese@cslt.org>
Sent: Tuesday, August 18, 2020 3:54 PM
To: John Schauble <John.Schauble@fcc.gov>; Susan Mort <Susan.Mort@fcc.gov>
Cc: Paul Malmud <Paul.Malmud@fcc.gov>; Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Nadja SodosWallace <Nadja.SodosWallace@fcc.gov>
Subject: RE: Special Temporary Authority

John,

I have attached the signed STA Request. Please let us know if there is anything further needed.

Thank you and your team for the direction,

Chuck Reese

Infrastructure Administrator

Information Technology

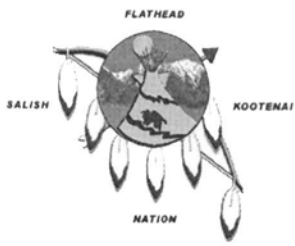
Confederated Salish and Kootenai Tribes

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OF THE FLATHEAD NATION

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A People of Vision

A Confederation of the Salish,
Pend d' Oreille
and Kootenai Tribes

TRIBAL COUNCIL MEMBERS:

Shelly R. Fyant -Chairwoman
Anita L. Matt -Vice Chair
Ellie Bundy McLeod - Secretary
Martin Charlo -Treasurer
Len Two Teeth
D. Fred Matt
Carole Lankford
James "Bing" Matt
Charmel R. Gillin
Mike Dolson

Tuesday, August 18, 2020

Request for Special Temporary Authority,

The Confederated Salish & Kootenai Tribes (CSKT) is requesting Special Temporary Authority (STA) to utilize all available and unassigned 2.5Ghz Educational Broadband Spectrum (EBS) on the Flathead Reservation. The COVID-19 virus presents CSKT with unique network access challenges with more than 800 fulltime employees, limited facilities and complex community safeguards to include but not limited to Schools, Remote Work, Childcare, and Healthcare.

We are requesting a STA for sixty (60) days to operate on unassigned 2.5GHz spectrum over New Channel 1 (2502-2551.5MHz), New Channel 2 (2551.5-2602MHz) and New Channel 3 (2615-2616MHz and 2673.5-2690MHz), over the eligible rural tribal land of the Flathead Reservation. CSKT also acknowledges existing EBS Stations in the far SW portion of the Flathead Reservation and will not operate within the Geographic Service Area of any existing EBS license, including Stations WNC728 and WNC763 (Frenchtown School District #40), WNC761 and WNC764 (Florence-Carlton School District #15-6). For the sake of expediting this request, we will be using the shape file from the 2.5GHz rural tribal mapping tool to identify the Flathead Reservation.

<https://fcc.maps.arcgis.com/apps/webappviewer/index.html?id=4287bc078a5e4c7dbd291d78e0534ca7&extent=-114.961616305,46.9301428197,-113.557114895,47.9600132203>

CSKT will use the spectrum under the STA to respond to COVID19-related emergencies. As of 06/25/20 CSKT has commenced a large-scale broadband deployment to cover more than 90% of the 1.3-Million acre Flathead Reservation. CSKT has developed an LTE Network that leverages the EBS spectrum for carrier grade aggregation and mobility. The deployment consists of four (4) 180-foot self-supported tower sites (Access Points) and twenty-one (21) Micro POPs. Backhaul will be provided by DWDM Fiber and Microwave Transport. We are slated to begin testing and configuring radios by 09/01/20. CSKT will comply with all service and technical rules associated with the 2.5GHz spectrum for the duration of the STA. CSKT acknowledges that operation under the STA is on a secondary, non-interference basis, that the STA is temporary, and CSKT will cease operations upon the termination of the STA. CSKT also agrees upon grant of an STA provides no right to the EBS spectrum that is available on the Flathead Reservation pursuant to the Tribal Priority Window.

Thank you for considering this request. For any further questions or concerns regarding this matter please contact Chuck Reese, CSKT Infrastructure Administrator chuck.reese@cskt.org Cell: 406-253-0405

Sincerely,

Shelly R. Fyant, Chairwoman
Confederated Salish & Kootenai Tribes



PUBLIC NOTICE

Federal Communications Commission
445 12th 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.¹

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. 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).² 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.³

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

¹ 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.

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

³ 47 C.F.R. § 1.917(d).

- FCC -

Attachment
Wireless Telecommunications Bureau ECFS Non-docketed Filing Solution

- **Do not use the ECFS non-docketed filing portal to submit any applications that can be electronically filed in the Universal Licensing System (ULS) or anything for which another existing electronic-filing system is available.**
- **Filers should use the ECFS non-docketed filing portal for submitting the specific types of documents listed in the following categories of FCC Inboxes:**
 - a. INBOX – 1.913 Universal Licensing System Adjunct
 - i. Sublease applications;
 - ii. Multi-step transactions, such as simultaneous assignment applications or lease back applications where ULS filing cannot be accomplished; or
 - iii. Any other application where electronic filing via ULS is unavailable
 - b. INBOX – 1.931 Market-based STAs
 - i. Requests for Special Temporary Authority (STA) in market-based services, typically awarded by auction.
 - c. INBOX – 1.925 Waivers in Wireless Services filed by non-licensees
 - i. Any requests by non-licensees seeking waivers of rules in the wireless radio services (e.g. equipment certification waivers).
- **Do not use the ECFS non-docketed filing portal to submit any confidential documents, as all documents uploaded via ECFS are available to the public. If an application requires the submission of confidential information, please coordinate with FCC staff to submit the specific confidential components via email.**

Filing instructions:

1. Filers should access the ECFS filing portal at <https://www.fcc.gov/ecfs/filings>.
2. Click on the blue header labeled “Non-Docketed Filing.”
3. From the field labeled “FCC Inbox,” use the drop-down menu to select the appropriate inbox for the intended filing. The following three WTB inboxes have been established for applicable filings:
 - a. INBOX – 1.913 Universal Licensing System Adjunct
 - b. INBOX – 1.931 Market-based STAs
 - c. INBOX – 1.925 Waivers in Wireless Services filed by non-licensees
4. Complete the necessary fields regarding filer information
5. In the “Upload Documents” field, click to upload the appropriate document or drag and drop the document in the perforated box.
 - a. Filers must include an electronic copy of their completed application signed pursuant to section 1.52 of the Commission’s rules, as well as any associated attachments.
 - b. Application filings must continue to utilize standard FCC forms for the intended application type, as found on the FCC forms page:
<https://www.fcc.gov/licensing-databases/forms>.
 - c. The ECFS system permits a maximum of five uploadable files per filing;

- d. Filing types accepted are PDF, text, ppt, pptx, docx, xlsx, doc, xls, rtf, and dwg.
6. Select “continue to review screen” at bottom of screen
 - a. Review summary of information completed for accuracy.
 - b. If any corrections are required, filers can navigate back to the previous screen with the filer information using their browser’s back button.
7. Once filers have confirmed that the information they entered is correct, click the “submit” button on the bottom of the screen.
 - a. Filer will receive a confirmation number upon submission
 - b. Please save the number for tracking purposes.
8. If your application requires a fee, FCC staff will bill filers for the applicable fee once the application has been assigned a file number or otherwise keyed into ULS.
 - a. Filers will receive a letter notifying them of the payment due
 - i. During this temporary mandated telework period due to COVID-19, OMD is temporarily emailing applicants their bill
 - b. All fees must be paid electronically; Filers will utilize the Fee Filer portal to make the associated payment electronically: <https://apps.fcc.gov/FeeFiler/login.cfm>
 - c. Filers will have 30 days to remit payment electronically from the issuance of the notice from FCC staff.
9. Please direct any questions about filed applications to WTB Staff:
 - a. Mobility Division: Keith Harper (202) 418-2759; Keith.Harper@fcc.gov
 - b. Broadband Division: Paul Malmud (202) 418-0006; Paul.Malmud@fcc.gov.
10. Technical Assistance:
 - a. For technical assistance with ECFS, please contact the ECFS Help Desk at 202-418-0193 or ECFSHelp@fcc.gov.
 - b. For technical assistance with FCC Pay fees, please contact the ULS Help Line: (877)480-3201 and select option 2 (Mon.-Fri. 8 a.m.-6 p.m. ET).