

## Connie Diaz

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**From:** Elizabeth Fishel  
**Sent:** Friday, April 17, 2020 3:15 PM  
**To:** Jim Dunstan; 'Christopher Becenti'; Susan Mort; Blaise Scinto; John Schauble; Paul Malmud; Stephen Buenzow (CTR); Sommer Gilbert; Susan Mickley; Tim Hilfiger  
**Cc:** Charles Mathias; Dana Shaffer; Donald Stockdale; Cecilia Sulhoff; Sean Spivey; Connie Diaz  
**Subject:** FW: Navajo Nation STA request  
**Attachments:** T2430R\_Navajo\_Nation\_Reservation.zip; Navajo Nation Reservation Map.pdf; President letter to FCC re educational broadband2 1.pdf

Good afternoon,

Shown below is the Navajo Nation's granted emergency STA.

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

Elizabeth (Beth) Fishel

The Navajo Nation'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 the Navajo Nation Reservation (as defined in the attached shape file) is granted via this email for a period of 60 days. The Navajo 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. 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. This STA does not authorize the Navajo Nation to operate on any currently licensed spectrum within the geographic service area of any existing EBS licensee, including call signs WNC258, WNC288, WNC601, and WNC712. The Navajo Nation must cease operating at the expiration of this STA. In addition, the Navajo 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 Navajo Nation must file an STA application for Special Temporary Authorization to continue its operations within 10 days of today's date (April 17, 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 the Navajo Nation is ready to deploy immediately. Grant of this STA does not prejudice or impact the rights of any eligible entity to apply for unassigned EBS spectrum on the Navajo Nation Reservation pursuant to the 2.5 GHz Rural Tribal Priority Window that is currently open, nor does it infer any rights to the Navajo Nation 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:** Jim Dunstan <jdunstan@mobiuslegal.com>  
**Sent:** Thursday, April 16, 2020 9:05 AM  
**To:** John Schauble <John.Schauble@fcc.gov>; 'Christopher Becenti' <chrisbecenti@navajo-nsn.gov>  
**Cc:** Elizabeth Fishel <Elizabeth.Fishel@fcc.gov>; Paul Malmud <Paul.Malmud@fcc.gov>; Susan Mort <Susan.Mort@fcc.gov>  
**Subject:** RE: Navajo Nation STA request

Attached please find an updated STA request from the Navajo Nation for use of the 2.5 GHz spectrum on the Navajo Nation.

I am also attaching a shape file and PDF map of the requested area.

We appreciate the Commission's quick response on this and all your efforts during this difficult time.

Please don't hesitate to contact me with any further questions.

Best Regards.

Jim

**James E. Dunstan**  
Mobius Legal Group, PLLC  
703-851-2843



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# THE NAVAJO NATION

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JONATHAN NEZ | PRESIDENT MYRON LIZER | VICE PRESIDENT

## Request for Special Temporary Authority

The Navajo Nation is requesting Special Temporary Authority “STA” to utilize all available and unassigned 2.5 Ghz Educational Broadband Spectrum “EBS” on the Navajo Nation. The COVID-19 virus presents the Navajo Nation with unique telecommunications challenges as we are seeking all available resources to provide internet access across our Nation. We are requesting a Special Temporary Authority for sixty (60) days to utilize all unassigned EBS spectrum channels 1, 2, and 3 on the Navajo Nation. For the sake of expediting this request, we will be using the shape file from the 2.5 GHz rural tribal mapping tool to identify the Navajo Nation.

Our K-12 public schools have made the decision to close the schools for our student’s safety and transition into distant learning. Our colleges and universities are also transitioning to distant learning via online courses.

We have become concerned for our student’s education as it may be compromised due to the lack of internet access throughout the Navajo Nation. The Navajo Nation has implemented Shelter at Home orders and established a curfew to flatten the curve on the Navajo Nation. This has created an increased demand for internet access at home. Our service providers are working hard to provide internet access, as they onboard more customers, the spectrum they have now is not meeting capacity needs. The 2.5 Ghz EBS Spectrum can enable our service providers to increase capacity and ensure consumer and student needs are met.

We understand this spectrum is currently in the application phase for tribes. However, due to COVID-19, we request the handling of this STA request to be expedited as quickly as possible to help our students throughout the Navajo Nation. We will comply with all rules outlined for any STA request as we also understand this is only temporary. The Navajo Nation will seek permanent licensed access to this spectrum by applying before the tribal priority window ends.

The Navajo Nation requests this STA to operate in the 2.5 GHz EBS band over the entire Navajo Nation as designed in the linked shape file and attached to this STA request:

<https://fcc.maps.arcgis.com/apps/webappviewer/index.html?id=4287bc078a5e4c7dbd291d78e0534ca7&extent=-112.227871352,34.1237227201,-106.442053933,38.0688970401>

The Navajo Nation will comply with all service and technical rules associated with the EBS spectrum for the duration of the STA. The Navajo Nation acknowledges that the grant of this STA is temporary and it will cease operations upon the termination of the STA. In addition, The Navajo Nation acknowledges and agrees that grant of this STA provides no rights to the EBS white space spectrum that is available on the Navajo Nation Reservation pursuant to the

EBS Tribal Window that is currently open. Finally, The Navajo Nation disclaims any right to operate on spectrum currently licensed to other licensees.

Thank you for your consideration for this request. Should you have any questions or need any additional information, please contact Chris Becenti, Director, Navajo Telecommunications, [chrisbecenti@navajo-nsn.gov](mailto:chrisbecenti@navajo-nsn.gov), 928-871-7853.

Sincerely,

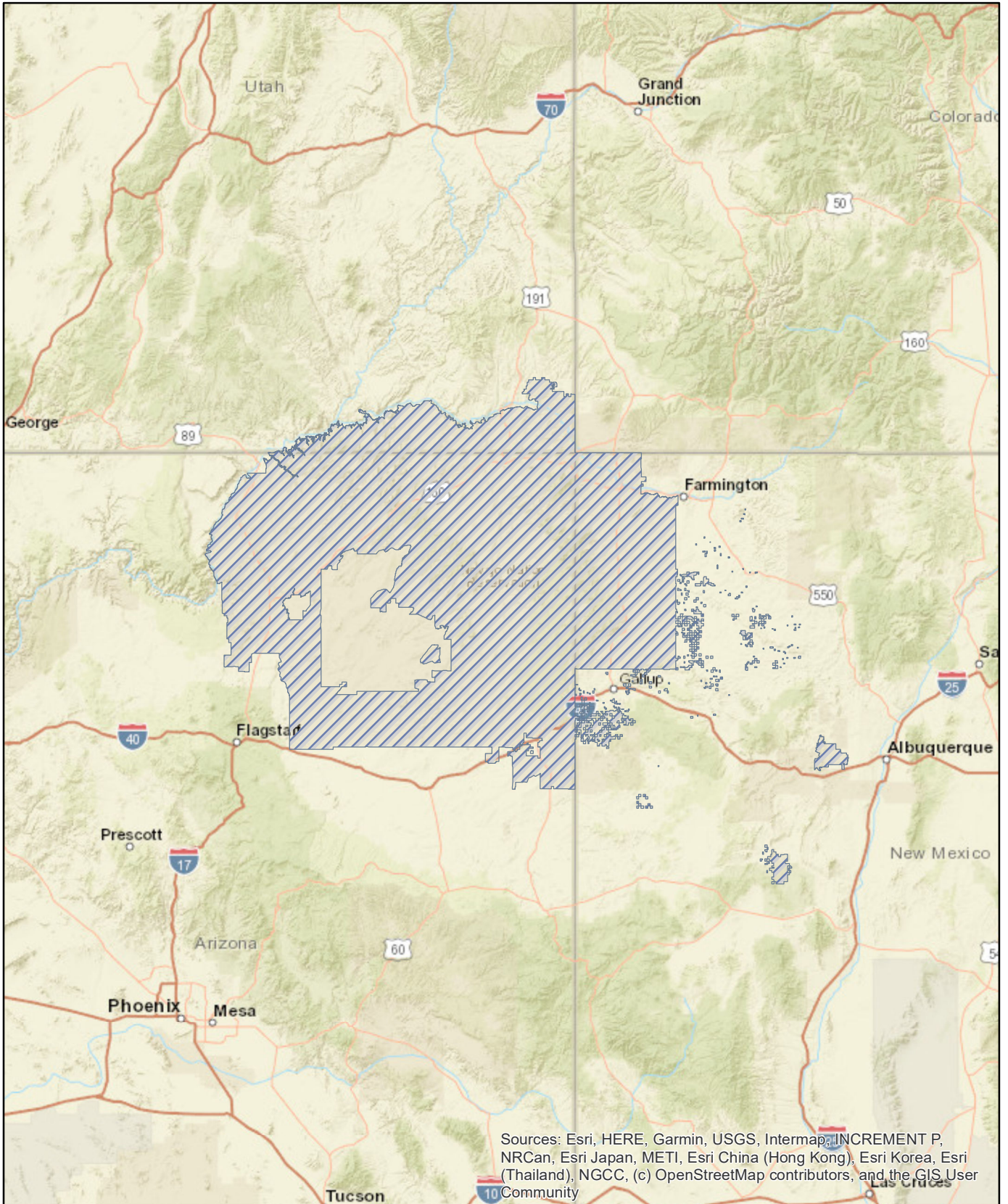


Jonathan Nez, *President*  
THE NAVAJO NATION



Myron Lizer, *Vice President*  
THE NAVAJO NATION

 Navajo Nation Reservation



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community