

DESCRIPTION OF APPLICATION AND PUBLIC INTEREST STATEMENT

I. Introduction

Pursuant to Sections 5.59 and 5.63 of the Commission’s regulations, 47 C.F.R. §§ 5.59 and 5.63, Eutelsat America Corp. (“EAC”) hereby requests a modification of its experimental license (Call Sign WH2XIG) to continue to exhibit, demonstrate, and test the operational characteristics of two earth station terminals in the conventional Ku-band, in addition to its previously-licensed C-band operations.¹ This request is nearly identical to EAC’s previous request for special temporary authority; the instant request seeks only to add such Ku-band authority to EAC’s existing experimental license.²

Operations will continue to occur (i) on the rooftop of EAC’s Washington, DC office; and (ii) at various customer facilities across the United States. Authorization is sought for a one-year period.

II. Description of Operations and Public Interest Statement

EAC is an indirect subsidiary of Eutelsat S.A., a leading global satellite operator in Europe. Eutelsat S.A. operates a network of 37 satellites providing near-global coverage to a variety of industries. EAC, as Eutelsat S.A.’s American subsidiary, was established to serve the North American market, offering a wide range of broadband and data solutions to support both government and commercial customers.

EAC submits the instant application in order to support its continued testing, exhibition, and small-scale demonstration of two new earth station terminals offered by its corporate parent, Eutelsat S.A.: the Kathrein CS 80 and the Kathrein CS 120. These innovative terminals incorporate technology whereby an electronic feed – a unique low-noise block downconverter (the “Smart LNB”) – is connected to a traditional direct-to-home (“DTH”) antenna with an embedded transmitter.³ The transmitter is based on an open standard and takes advantage of a narrowband return link, optimized for short transmissions of IP packets with low duty cycle.

Building upon its prior successful demonstration of these terminals, EAC seeks to maintain its ability to exhibit, demonstrate, and test the operational characteristics of the Smart LNB terminals. These experimental operations will allow EAC increased flexibility to conduct long-term testing of the operational characteristics of the Smart LNB terminals, as well as the opportunity to demonstrate and exhibit the terminal to a larger audience of potential customers.

EAC seeks to expand upon its initial STA by adding Ku-band testing authorization to its existing experimental license. As it has pursuant to the terms of its initial STA, EAC will coordinate with all necessary parties – including fixed microwave service licensees – prior to

¹ See ELS File No. 0434-EX-PL-2014, granted July 28, 2014.

² See ELS File No. 0124-EX-ST-2015, granted Mar. 2, 2015.

³ See Exhibit A for a picture of the Smart LNB-enabled terminals.

operation of the Smart LNB terminals. At all times, testing will be conducted under the close supervision of EAC personnel.

The public benefits of these new terminals are numerous. As a result of this cutting-edge technology, Smart LNB terminals will allow broadcasters to operate an ecosystem of linear television and other “connected TV” services via satellite. Additionally, it will allow broadcasters in the future to extend their service offerings to new domestic applications.⁴ The Smart LNB terminals are consumer-grade devices, intended as cost-effective solutions to provide millions of users with advanced, in-home interactive services based wholly on a satellite infrastructure.

III. Test Frequencies and Coordination

EAC seeks to transmit using the specific frequency ranges identified below:

<i>Frequency Range (MHz)</i>	<i>Band</i>
5925 – 6425 MHz	Conventional C-Band Uplink
3700 – 4200 MHz	Conventional C-Band Downlink
14 – 14.5 GHz	Conventional Ku-Band Uplink
11.7 – 12.2 GHz	Convention Ku-band Downlink

These frequency bands are designated on a co-primary basis for use by the fixed-satellite services (“FSS”).⁵ Satellite-based connectivity for both the CAS 80 and CAS 120 terminals will be provided by the Eutelsat 117WA and Eutelsat 113WA satellites, both of which are on the Commission’s Permitted Space Station List.⁶ The Eutelsat 117WA and Eutelsat 113WA satellites are authorized to provide service in these requested bands.⁷

EAC will take all actions necessary to avoid causing interference to licensed users in the C- and Ku-bands, and will comply with any and all conditions imposed by the Commission.

IV. Stop Buzzer and Contact Information

⁴ The broad range of services that can be conducted via the Smart LNB terminal includes payment transactions, subscription-based and on-demand services, home automation, pay-per-view, social networking, live show participation, subscription management, and audience measurement. All these services will be conducted using narrowband transmissions.

⁵ See 47 C.F.R. § 2.106.

⁶ See FCC File No. SAT-PDR-19991214-00131, granted Oct. 3, 2000; (Eutelsat 117WA, f/k/a Satmex 5); see also FCC File No. SAT-PPL-20060329-00030, granted Aug. 4, 2006 (Eutelsat 113WA, f/k/a Satmex 6).

⁷ *Id.*

The “Stop Buzzer” contact at EAC is Vince Walisko, who will be available 24 hours per day, 7 days per week to cease operations should any reports of harmful interference be received. Vince Walisko can be reached at:

(202) 448-9667 (mobile)
(202) 559-4336 (landline)
vwalisko@eutelsatamerica.com (email)

For any questions regarding this application, please contact:

Brian D. Weimer
Sheppard Mullin Richter & Hampton LLP
202-747-1930 (phone)
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V. Conclusion

For the reasons set forth above, EAC respectfully requests that the Commission expeditiously grant the requested modification of an experimental license in order to facilitate its continued development and implementation of innovative, consumer-oriented antenna terminals.