

November 15, 2014

VIA ELECTRONIC FILING

Nnake Nweke
Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Panasonic Avionics Corporation, Call Sign WF2XMD, File No. 0184-EX-ML-2013
Addition of New Antenna Type for Testing and Demonstration**

Dear Mr. Nweke:

Panasonic Avionics Corporation (“Panasonic”), through the undersigned counsel, hereby notifies the Commission, pursuant to Section 5.77 of the Commission’s Rules, 47 C.F.R. § 5.77, that Panasonic will temporarily operate an additional Ku-band transmit/receive terminal type not specifically included in the above-referenced authorization. Specifically, Panasonic seeks to test and demonstrate the Rantec Ku-Band SATCOM antenna with its existing satellite network. The Commission has previously authorized this aeronautical terminal for similar experimental testing and demonstration operations.¹

Panasonic will operate up to three (3) such terminals for testing and demonstration with the eXConnect Ku-band aeronautical broadband system under the above-referenced authorization. In this connection, Panasonic will operate three (3) fewer MELCO antennas (one of the antenna types authorized under this experimental license) so that the total number of antenna terminals authorized for operation under Panasonic’s experimental license does not change.

¹ See, e.g., Intelsat License, LLC, Experimental Special Temporary Authorization, File No. 0359-EX-ST-2012, Call Sign WF9XRY (June 1 2012).

The Rantec Ku-band SATCOM antenna, specifically developed to operate in the aeronautical environment, will be operated within the same technical envelope (e.g., off-axis EIRP spectral density levels, emissions designators, pointing accuracies, cessation of emissions requirements, and RF safety characteristics) as currently authorized antennas. Panasonic's limited operations also will comply with the Section 25.227 of the Commission's rules governing earth stations aboard aircraft ("ESAAs").²

Because the Rantec Ku-band SATCOM antenna will operate with the same technical parameters as the currently authorized terminals (*i.e.*, similar emissions designators, transmit spectrum and authorized power) and Panasonic will otherwise conform to the conditions of its existing experimental license, operation of the terminal is consistent with Section 5.77 of the Commission's Rules, 47 C.F.R. § 5.77.

Finally, Panasonic acknowledges and accepts that the conditions in its existing experimental authority will apply to operation of the Rantec Ku-band SATCOM antenna, including operation on an unprotected, non-interference basis and the requirement to immediately cease operations in the event of harmful interference.

Please feel free to contact the undersigned with any questions regarding this matter.

Sincerely,

PANASONIC AVIONICS CORPORATION



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² See 47 C.F.R. § 25.227.