

## **NARRATIVE STATEMENT**

Pursuant to Section 5.54(a)(1) of the Commission's Rules, 47 C.F.R. §5.54(a)(1), Satcom Direct, Inc. ("SDI") respectfully requests experimental authority to operate in the 118.000 – 136.975 MHz, 1616.000-16.27.000 MHz, 1626.500-1660.500 MHz, and 29.0-30.0 GHz frequency bands for the purpose of conducting testing and experiments as part of its product development trials for value-added products and services to SDI eventually plans to market as complements the basic airtime services SDI currently resells to its end user customers.

### **Purpose of Operation and Need for Experimental License**

SDI proposes to test and develop the products and services listed below.

- The Satcom Direct Router ("SDR") – an aircraft router that automatically selects the best satellite connection available and keeps the connection updated continuously. The SDR will be loaded with services that compress and cache data, allowing maximum bandwidth for the transmission of information.
- SD WiFi Hub – A wireless access point designed to work seamlessly with the SDR onboard aircraft. The hub also comes loaded with a number of other SD value-added services.
- GlobalVT – A service that enables operators to use devices while in flight. GlobalVT works via SDI's innovative voice codec designed specifically for aircraft communications over satellite networks. This technology addresses latencies, providing clearer, crisper voice quality.
- SkyShield – A data filtering service designed to filter out unwanted data communications to enable faster and more cost-effective data connections.
- AeroXR – a compression and acceleration service that increases data throughput for unparalleled levels of high-speed data exchange.

In addition to testing and demonstrating SDI's own value-added products and services, SDI will use the radio communications and equipment to test its customers' hardware and service configurations to ensure their services are delivered effectively and efficiently. SDI will also troubleshoot customer technical issues, and train its employees on the various satellite services.

### **Public Interest Statement**

SDI submits that issuance of the requested experimental license will serve the public interest, convenience and necessity. The subject products and services are designed to enhance communications to and from aircraft while in-flight. When marketed and put into operation, these products and services will contribute to the expansion of services to make aircraft

operations safer and communications more rapid and reliable, with less latency and more efficient use of bandwidth. As these products and services will be utilized in aircraft communications, public safety demands that SDI ensure that they will operate effectively when used by its customers. Grant of the requested experimental license will enable SDI to conduct necessary testing and market trials that will ensure that the products and services are properly designed to ensure that they will be operational at the highest level of efficiency when marketed.

### **Restrictions on Operation**

SDI will not market, lease or sell any of the subject products or services during the effective period of the experimental license. SDI also understands that the proposed experimental operation must not cause harmful interference to authorized facilities. SDI does not anticipate any interference issues. In the unlikely event that any interference occurs, SDI will immediately take steps to resolve the interference, including discontinuing operation, if necessary. SDI will inform persons and entities using the equipment that permission to operate same has been granted under experimental authority, is strictly temporary, may be cancelled at any time, and that any unauthorized equipment may not be offered for sale or lease until authorization is obtained. SDI proposes to label the equipment or user information with information as follows:

#### ***FCC Statement***

*Permission to operate this device has been granted under experimental authority issued by the Federal Communications Commission, is strictly temporary and may be cancelled at any time.*

*This device has not been authorized by the rules of the Federal Communications Commission. This device is not, and may not, be offered for sale or lease, sold or leased, until authorization is obtained. Thus, the user does not hold a property right in the device and may be required to return it.*

### **Request for Expedited Processing**

SDI proposes to start testing on or before October 20, 2016, but not before approval has been granted; SDI respectfully requests expedited processing to achieve this start date. SDI needs sufficient time to properly install equipment at its proposed site, finalize test procedures, and provide training and equipment to the employees that will conduct the tests.

### **Additional Information**

Required information concerning: (a) testing location and antenna specifications; (b) contacts; and (c) technical information are included in the accompanying application. If any further information is required to process the application, please the individual listed in the application as the person who can best handle inquiries pertaining to same.