

From: David Katko

To: Leann Nguyen
Date: April 17, 2019

Subject: Request for Info - File # 0076-EX-CM-2019

Message:

Leann-

Thank you for your correspondence related to File Number 0076-EX-CM-2019.

Based on your requests, the Form 442 and narrative that were submitted may not be specific enough regarding the frequency ranges that the ACT-A will operate in over O3b.

To be clear, the ACT-A will transmit only in the following frequency bands when operating over O3b during experimental testing:

Florida Beam: 27.912 – 28.128 GHz (shown in Form 442 in the mobile station “CONUS and US Territorial Waters”)

San Andres Beam: 27.625 – 27.868 GHz (shown in Form 442 in the mobile station “Gulf of Mexico, Atlantic Ocean, Caribbean Sea”)

The ACT-A will not operate in the 28.438 – 28.563 GHz and 29.3 – 30.0 GHz frequency bands when communicating with O3b during experimental testing.

Responses to your specific requests:

a. Thales's experimental grant under Call Sign WJ2XSO already authorizes ACT-A testing in the 28.438 – 28.563 GHz and 29.3 – 30.0 GHz frequency bands. Testing has already been conducted over AMC-15 and AMC-16, using these frequency bands. The EIRP spectral density patterns you request are available and can be provided if needed, but it's not clear why they're needed in relation to our proposed operations over O3b, which will not use these frequency bands.

b. As stated above, our proposed operations over O3b will not use the 28.438 – 28.563 GHz and 29.3 – 30.0 GHz frequency bands; therefore, there is no potential for non-compliance with ITU RR Article 22.5D. Please note that the carriers on O3b, using transmit frequencies 27.912-28.128 GHz and 27.625-27.868 GHz, have been certified by SES and O3b to meet ITU-R Article 22.5D. See comment “c.” regarding certification letters.

c. A certification letter from O3b was submitted as an Exhibit with the filing, which certified that Thales's “...testing and operation of the ThinKom 2517 terminal will be conducted in conformance with its international coordination agreements and the terms of O3b's Market Access Grant.”

I hope this provides clarity and adequate information for your requests. Please let me know if you have questions or require any more information.

Sincerely,
David Katko
Thales Avionics, Inc.