

**UltiSat Inc., Application for Experimental
Special Temporary Authorization (“STA”)**

STATEMENT OF NATIONWIDE OPERATIONS

UltiSat Inc. (“UltiSat”) has requested a nationwide experimental special temporary authorization (“STA”) for a period of six months to further evaluate the functionality and performance of up to 10 Ku-band ESAA terminals – the Skytech Model BB30.¹ UltiSat was previously granted authority to operate the BB45 terminal, a larger but otherwise technically identical terminal, under a prior experimental STA.² UltiSat operated the BB30 terminal within the same operational envelope under the UltiSat Experimental STA pursuant to the Commission’s experimental licensing rules.³

The Commission has requested that UltiSat submit as an attachment to the BB30 Experimental STA Application an exhibit describing in greater detail the purpose of requesting nationwide authority.⁴ This statement explains the need for nationwide STA authority to further evaluate and test the BB30 terminal.

As the Commission is aware, UltiSat provides diverse satellite communications services for U.S. Government (“USG”) customers and seeks to operate the BB30 terminal

¹ See UltiSat Inc., File No. 1930-EX-ST-2018, Call Sign WN9XQQ (“*BB30 Experimental STA Application*”).

² See UltiSat Inc., File No. 0201-EX-ST-2018, Call Sign WM9XHN (“*UltiSat Experimental STA*”) (prior STA authority that expired on September 2, 2018). UltiSat now operates the BB45 terminal under commercial ESAA authority by the FCC International Bureau under Section 25.227 of the Commission’s rules. See UltiSat Inc., File Nos. SES-STA-20180621-01477 & SES-STA-20180724-01969; see also UltiSat Inc., File No. SES-LIC-20180726-02089, Call Sign E181298 (pending).

³ See File No. 0201-EX-ST-2018, Call Sign WM9XHN, Section 5.77 Letter to Anthony Serafini, *Addition of New Antenna Type for Experimental Testing and Demonstration* (June 5, 2018) (notification of BB30 terminal operation).

⁴ See Correspondence of Behnam Ghaffari to Carlos Nalda, File No. 1930-EX-ST-2018, Correspondence Ref. No. 45083 (Nov. 16, 2018).

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to support intelligence, surveillance and reconnaissance (“ISR”) missions for various U.S. military commands and government agencies.⁵ The BB30 terminal, an airborne stabilized antenna system that provides high-quality satellite communications for aeronautical application, will be tested in both stationary and in-flight modes during the STA period.

There has been high demand for the BB30 terminal and a number of USG military and civilian agencies have sought to evaluate the terminal for their unique missions. These evaluations involve stationary testing at UltiSat headquarters in Gaithersburg, Maryland, and at various USG military or civilian facilities around the United States. In addition, in-flight evaluation and testing involves use of the terminal onboard aircraft operated by or on behalf of USG military and civilian agencies. UltiSat does not have full visibility or control over the flight paths of those aircraft. Thus, UltiSat cannot more narrowly define the geographic scope of stationary and in-flight testing of the BB30 that may occur during the STA period.

The BB30 will operate in commercial Ku-band frequencies that have been carefully selected to avoid frequency overlap with other systems and services.⁶ As a result, there is no potential for interference from the proposed operations. In addition, nationwide authority is essential given the nature and scope of the proposed operations. UltiSat therefore respectfully requests that the Commission grant a six-month STA to test and evaluate the BB30 terminal to support USG operations at the earliest practicable time.

⁵ UltiSat respectfully refers the Commission to information submitted to support the UltiSat Experimental STA for a detailed description of the types of USG programs supported by UltiSat’s proposed operations. *See* UltiSat Inc., File No. 0201-EX-ST-2018, Call Sign WM9XHN at Confidential Exh. 1.

⁶ *See* BB30 Experimental STA Application at Narrative and STA Form.