

From: Steve Hemple

To: Leann Nguyen

Date: April 26, 2019

Subject: Request for Info - File # 0085-EX-CM-2019

Message:

In response to questions 3) and 4), both answers can be found within the market access grant under file number SAT-PDR-20161115-00114 for call sign S2981. Per the Order and Declaratory Ruling,

"We find that Kepler's EPFD analysis provided in its Petition and associated filings is sufficient to justify this grant of market access"

"The Commission determined first to require NGSO FSS satellite operators to attempt coordination based on the specifics of their individual systems. If coordination is ongoing or cannot be reached when both systems are operational, the Commission provided that NGSO FSS operators must avoid causing harmful interference by dividing the commonly authorized frequencies when a technical interference threshold is exceeded, defined as a when change in system noise temperature caused by interference, or $\Delta T/T$, exceeds 6 percent."

and

"In addition, as a condition to this grant of U.S. market access, Kepler must communicate the ITU finding to the Commission and submit the files containing the data used as input to the ITU validation software. We find such a requirement satisfies the concerns of GSO FSS operators who request verification, either by the Commission or third parties, of the complete set of input information used for the EPFD showing to the ITU."

Regards,

Steve Hemple