

To: Sam Avery
E-Mail: sam.avery@audacy.space
From: Doug Young
Date: July 10, 2017

Subject: Request for Info - File # 0127-EX-CN-2017

Message:

Address the issues below:

PFD/EPFD Analysis:

The FCC has reviewed all the documentation provided for this application and did not find any PFD/EPFD analysis detail showing that this satellite network will comply with the Commission rules and ITU (Articles 21 and 22) satellite radio regulation requirements. Applicant please provide a detailed showing of all the applicable PFD/EPFD limits.

Cost Recovery letter:

On the Cost Recovery letter, the FCC kindly requests the applicant to provide this letter with the company cover letter and resign it. Be advised that the signatory of this letter should be someone duly authorized by Audacy Corporation to sign this cost recovery commitment on behalf of Audacy Corp.

Form 442:

For the uplink frequency 29.5-30 GHz the ERP value is given as 12.3 MW; however, our ERP calculation value is 7.67 MWatts with the antenna gain of 64 dBi; ($7 \text{ dBW} + 64 \text{ dBi} = 71 \text{ dBW} - 2.15 \text{ dBi} = 68.85 \text{ dBW}$; divide by 10 = 6.885 and raise to the 10^6 gives approx. = 7.67 MWatts. Applicant please review our calculation and make any necessary changes as appropriate or provide a detail calculation on how the 12.3MW value was derived.

The antenna pattern provided has a gain of 65 dBi with 0.1 degree beamwidth; the API filing has the uplink antenna gain as 64 dBi with a 0.2 beamwidth. Please review this information and either update as appropriate or provide the FCC a rational why these values vary.

For the downlink 20.0125 GHz, the ERP value is given as 1.3W; however, our calculation shows a 3.12W value. ($1.1 \text{ dBW} + 6 \text{ dBi} = 7.1 \text{ dBW}$; $7.1 \text{ dBW} - 2.15 \text{ dB} = 4.95 \text{ dBW}$; divided by 10 and then raised to the 10 power yields approximately 3.12 Watts). Applicant please review our calculation and make any changes as appropriate or provide an explanation how this value is derived.

SpaceCap API file:

Orbital parameter section, show the altitude at 10 km which seems to be a mistake because the apogee and perigee values are given as 575 km; applicant review and verify the altitude of this mission.

In the whole API filing, the class of station is given as EA = amateur; this mission is not amateur; please provide an appropriate class of station for the space station and earth station in each link.

UPLINK beam, Group ID 1, the max peak power is given as 1 dBW; however, in Form 442 the max power is given as 5W = 7 dBW; applicant review and verify the max output power and update as appropriate.

Also, note that if the power level changes so will the power spectral density values.

On all the DOWNLINK beams, provide the minimum elevation angle and indicate if the satellite will transmit only when visible from notified service area.

On all the DOWNLINK earth stations, the antenna gain value is given as 61 dBi with a 0.3 beamwidth; however, the NTIA Space record data form has the beamwidth as 0.1 degrees. Please review and verify the beamwidth of this earth station.

Exhibit: Antenna patterns:

Please resubmit the antenna pattern documents without any reference to the company name or mission; the technical description is okay.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of July 10, 2017 may result in application dismissal pursuant to Section 5.67 and forfeiture of the filing fee pursuant to Section 1.1108.

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