

EXHIBIT A

DESCRIPTION

Kepler Communications (“Kepler”) hereby requests special temporary authority beginning on June 26, 2019 and continuing for 90 days thereafter to operate a Sea Tel 9711 earth station in Ku-band for a testing and proof-of-concept demonstration in Concord, California. The requested operations are necessary to continue engineering efforts in relation to the delivery of Fixed Satellite Services to customers in the scientific, oil and maritime sectors. This authorization will enable the development of core user terminal functionality and compatibility ahead of commercial deployment, allowing Kepler to deliver the service described in its market access grant in a timely fashion.¹ Delay or rejection of this request would jeopardize this ability and strongly prejudice the public interest.

Terminals will operate within the 11.7 – 12.2 GHz and 14.0 – 14.5 GHz bands for downlink and uplink respectively. All transmissions in these bands will conform to the applicable power flux density and equivalent power flux density levels specified by Article 21, Article 22, and Resolution 76 of the ITU Radio Regulations.

In accordance with 47 C.F.R. § 17.7(e)(3), a notification to the FAA is *not* required for any antenna structure of 6.10 meters (20 feet) or less in height, except one that would increase the

¹ See Kepler Communications Inc., *Petition for Declaratory Ruling to Grant Access to the U.S. Market for Kepler’s NGSO FSS System*, Order and Declaratory Ruling, FCC 18-162 (Nov. 19, 2018).



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height of another antenna structure. Kepler hereby certifies that the construction of the antennas associated with this application will not exceed the minimum height requirement specified in the above-mentioned limit.

Respectfully Submitted

/S/ Nickolas G. Spina

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Director, Launch & Regulatory Affairs