Kepler Communications Inc.
196 Spadina Avenue, Suite 400
Toronto, ON Canada
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EXHIBIT A

DESCRIPTION

Kepler Communications ("Kepler") hereby requests special temporary authority beginning on November 18, 2019 and continuing for 180 days thereafter to operate several Ku-band earth stations for testing and proof-of-concept demonstrations in Houston, Texas. 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] This application includes terminal types that have not yet been comprehensively tested with Kepler's network. An application for regular authority of two of the three listed stations was submitted through IBFS on June 17, 2019 and is pending Commission review. Delay or rejection of this request would jeopardize the ability for Kepler to adequately roll out the services described in its market access grant, thereby prejudicing 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

[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).

76 of the ITU Radio Regulations. A detailed discussion of this compliance is provided in *Exhibit C* to this application.

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 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

Nick G. Spina

Director, Launch & Regulatory Affairs