

NARRATIVE STATEMENT

This Narrative Statement, dated March 29, 2017, provides some minor clarification to the original Narrative Statement to this application. This is the operative document. Pursuant to Section 5.54(a)(1) of the Commission's Rules, 47 C.F.R. §5.54(a)(1), Satcom Direct, Inc. ("SDI") respectfully requests experimental authority to operate in the 1616.000-1627.000 MHz, 1626.500-1660.500 MHz, 14.0-14.5 GHz and 29.0-30.0 GHz frequency bands for the purpose of conducting testing and experiments as part of its product development and improvement trials for value-added products and services to the basic commercial satellite airtime services SDI currently resells to its aviation end user customers. The operations conducted pursuant to this license will be limited to the site listed in the instant application

Purpose of Operation and Need for Experimental License

SDI proposes to test and develop the products and services listed below for its business aviation and government aviation customers, in addition to future value-added products and services that may operate over the subject frequency bands.

- The Satcom Direct Router ("SDR") – an aircraft router that automatically selects the best satellite connection available and keeps the connection updated continuously. The SDR will be loaded with services that compress and cache data, allowing maximum bandwidth for the transmission of information.
- SD WiFi Hub – A wireless access point designed to work seamlessly with the SDR onboard aircraft. The hub also comes loaded with a number of other SD value-added services.
- GlobalVT – A service that enables operators to use mobile devices while in flight. GlobalVT works via SDI's innovative voice codec designed specifically for aircraft communications over satellite networks. This technology addresses latencies, providing clearer, crisper voice quality.
- SkyShield – A data filtering service designed to filter out unwanted data communications to enable faster and more cost-effective data connections.
- AeroXR – a compression and acceleration service that increases data throughput for unparalleled levels of high-speed data exchange.

In addition to testing and demonstrating SDI's own value-added products and services, SDI will use the radio communications and equipment to test its customers' satellite connectivity hardware and service configurations to ensure their satellite airtime services are delivered effectively and efficiently. SDI will also troubleshoot customer technical issues, and train its employees on the various commercial satellite services.

Public Interest Statement

SDI submits that issuance of the requested experimental license will serve the public interest, convenience and necessity. The subject products and services are designed to enhance cabin communications to and from aircraft while in-flight. These products and services will contribute to the expansion of services to make aircraft cabin operations more efficient and communications more rapid and reliable, with less latency and more efficient use of bandwidth. Grant of the requested experimental license will enable SDI to conduct necessary testing and market trials that will ensure that the products and services are properly designed to ensure that they are operational at the highest level of efficiency when used by its aviation customers over the subject satellite frequency bands.

Restrictions on Operation

SDI also understands that the proposed experimental operation must not cause harmful interference to authorized facilities. SDI does not anticipate any interference issues. In the unlikely event that any interference occurs, SDI will immediately take steps to resolve the interference, including discontinuing operation, if necessary. SDI will inform persons and entities using the satellite connectivity equipment that permission to operate same has been granted under experimental authority, is strictly temporary, and may be cancelled at any time. SDI proposes to label the satellite connectivity equipment or user information with information as follows:

FCC Statement

Permission to operate this device has been granted under experimental authority issued by the Federal Communications Commission, is strictly temporary and may be cancelled at any time.

Request for Expedited Processing

SDI proposes to start testing for improvements to its products and services on or before October 20, 2016, but not before approval has been granted; SDI respectfully requests expedited processing to achieve this start date. SDI needs sufficient time to properly install equipment at its proposed site, finalize test procedures, and provide training and equipment to the employees that will conduct the tests.

Additional Information

Required information concerning: (a) testing location and antenna specifications; (b) contacts; and (c) technical information are included in the accompanying application. If any further information is required to process the application, please the individual listed in the application as the person who can best handle inquiries pertaining to same.