



Federal Communications Commission
Washington, D.C. 20554

March 10, 2017

Ralph Ewig
Audacy Corporation
340 S. Lemon Ave.
Suite 8787
Walnut, CA 91789

Re: Audacy Corporation, IBFS File No. SAT-LOA-20161115-00117 (Call Sign S2982)

Dear Mr. Ewig:

On November 15, 2016, Audacy Corporation (Audacy) filed the above-captioned application for authority to construct, deploy and operate a non-geostationary orbit (NGSO) fixed-satellite service (FSS) and inter-satellite service system. To aid the Commission's evaluation of the application, please provide the following additional information:¹

1. Article 22 of the ITU Radio Regulations specifies equivalent power flux-density (epfd) limits applicable in frequency bands in which Audacy proposes to operate.² As part of its application, Audacy states that it will comply with the epfd limits for operations in the 19.7-20.2 GHz band set forth in Article 22 of the ITU Radio Regulations, and thus will not cause harmful interference to any existing operations in the band.³ Audacy further states that it will comply with the applicable epfd limits in Table 22-2 of ITU Radio Regulations in the 29.5-30.0 GHz band.⁴ Please provide a showing demonstrating the Audacy satellite system's compliance with the applicable epfd limits specified in Article 22 of the ITU Radio Regulations in these frequency bands.
2. Please provide information regarding the accuracy—if any—with which the parameters of satellite orbits will be maintained, including apogee, perigee, inclination, and the right ascension of the ascending node(s).⁵
3. A statement and/or analysis with respect to the long-term stability or instability of post-mission storage orbits. Such analysis should address any measures, such as selection of orbital parameters, that may affect the long-term evolution of orbital parameters, with particular attention to addressing any such evolution that would result in the satellites entering the geostationary protected region, *i.e.*, the area defined by the geosynchronous altitude, plus or minus 200 kilometers, and plus or minus 15 degrees from the equatorial plane, or the LEO protected region, *i.e.*, the area below 2000 km.

¹ 47 CFR § 25.111(a).

² ITU Radio Regulations, Article 22.

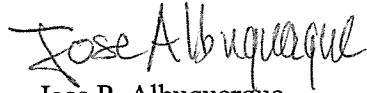
³ Audacy Application at 52.

⁴ Audacy Application at 58.

⁵ 47 CFR § 25.114(d)(14)(iii).

Audacy must file a letter providing this information by April 11, 2017. Failure to do so may result in the dismissal of Audacy's application pursuant to Section 25.112(c) of the Commission's rules, 47 CFR § 25.112(c).

Sincerely,

A handwritten signature in black ink that reads "Jose Albuquerque". The signature is written in a cursive style with a large, stylized initial "J".

Jose P. Albuquerque
Chief, Satellite Division
International Bureau