

Exhibit D

Description of Application

Ligado hereby requests an extension of the license term of MSAT-2 for two years, through December 31, 2020. Since Ligado has launched and commenced operations of SkyTerra 1, the replacement satellite for MSAT-2,¹ MSAT-2 has served as a backup for SkyTerra 1. All customers have been transitioned to SkyTerra 1, and MSAT-2 currently does not carry customer traffic. MSAT-2 remains capable of operation and continues to be a suitable backup satellite for SkyTerra 1 customers,² some of which provide service to government and public safety entities. MSAT-2 recently has been moved to 106.5 W.L. and has authority to operate from this location until December 31, 2018.³

Ligado estimates that the end of fuel life for MSAT-2 operations is June 2028. Ligado has confirmed that, at the conclusion of the requested extension period, MSAT-2 will have sufficient fuel to de-orbit to a disposal altitude that complies with the Inter-Agency Space Debris Coordination Committee standard, as stated in the MSAT-2 orbital debris mitigation plan.⁴ In addition, the MSAT-2 satellite telemetry, tracking, and command (“TT&C”) system and associated hardware continue to perform nominally with full redundancy available. Ligado has assessed the current health and performance status of the MSAT-2 satellite and reviewed possible risks associated with continued satellite operational activities. At this time, Ligado has no knowledge of any single point of failure or other malfunctions, defects, or anomalies that have occurred to date that would affect its ability to conduct and complete the required end-of-life and de-orbit procedures.

The proposed extension therefore would not impact the orbital debris mitigation plan for the satellite. The Commission previously has granted similar requests to extend the license term of MSAT-2,⁵ and granting the instant request similarly would serve the public interest.

¹ See Report No. SAT-00759 (Feb. 18, 2011).

² See, e.g., Annual Satellite Status Report, Call Signs AMSC-1 and S2358 (June 29, 2012) (documenting the transition of SkyTerra 1 customers to MSAT-2 when unusually intense solar activity temporarily impacted operations of SkyTerra 1).

³ See Stamp Grant, IBFS File No. SAT-MOD-20180912-00070 (granted Nov. 29, 2018).

⁴ See IBFS File No. SES-MFS-20070530-00731, Technical Narrative at 35-36.

⁵ See Stamp Grant, IBFS File No. SAT-MOD-20171215-00172 (granted Jan. 23, 2018); Stamp Grant, IBFS File No. SAT-MOD-20151218-00083 (granted Feb. 11, 2016); Stamp Grant, IBFS File No. SAT-MOD-20141212-00128 (granted May 14, 2015); Stamp Grant, IBFS File No. SAT-MOD-20131204-00143 (granted Feb. 11, 2014); Stamp Grant, IBFS File No. SAT-MOD-20121128-00203 (granted Jan. 24, 2013).