

# Morgan Lewis

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November 16, 2020

VIA IBFS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

### **Re: EOS Defense Systems USA, Inc., Minor Amendment to IBFS File No. SAT-MOD-20200526-00057 (Call Sign: S2982)**

Dear Ms. Dortch:

Pursuant to Section 25.116(c)(1) of the Federal Communications Commission's ("FCC" or "Commission") Rules,<sup>1</sup> EOS Defense Systems USA, Inc. ("EOS") herein requests the following minor amendments to the above-referenced modification application ("Application") concerning EOS's authority to operate a non-geostationary ("NGSO") satellite system.<sup>2</sup>

**Removal of 19.4-19.6 GHz.** Both Iridium Constellation, LLC ("Iridium") and O3b Limited ("O3b") operate feeder links in the 19.4-19.6 GHz band to support their respective NGSO systems. Both Iridium and O3b object to co-channel EOS service links.<sup>3</sup> In its Consolidated Opposition and Response ("Opposition"), EOS committed to take appropriate steps to remedy the concerns raised by Iridium and O3b.<sup>4</sup> To satisfy this commitment, EOS requests the deletion of the 19.4-19.6 GHz band from the Application. To harmonize the Schedule S associated with the Application, EOS requests revision of Transmitting Beam IDs SDR2 and SDL2 to reflect the removal of 19.4-19.6 GHz, and further requests the deletion of Transmitting Channel IDs SD27, SD28, SD29, SD30 and SD31.

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<sup>1</sup> 47 C.F.R. § 25.116(c)(1).

<sup>2</sup> See EOS Defense Systems USA, Inc., Modification of Authorization for Audacy NGSO Satellite System, IBFS File No. SAT-MOD-20200526-00057 (filed May 26, 2020) ("Application").

<sup>3</sup> See Petition to Deny in Part of Iridium Constellation LLC, IBFS File No. SAT-MOD-20200526-00057, at 3 (filed Aug. 31, 2020) ("Iridium Petition"); *see also* Petition to Deny or Condition of O3b Limited, IBFS File No. SAT-MOD-20200526-00057, at 4 (filed Aug. 31, 2020) ("O3b Petition").

<sup>4</sup> See Consolidated Opposition and Response of EOS Defense Systems USA, Inc., IBFS File No. SAT-MOD-20200526-00057, at 3 (filed Sep. 10, 2020) ("EOS Opposition").

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**Removal of 29.1-29.5 GHz.** Iridium operates feeder links in the 29.1-29.3 GHz band, and O3b operates feeder links in the 29.1-29.5 GHz. Both Iridium and O3b object to co-channel EOS service links.<sup>5</sup> In its Opposition, EOS committed to take appropriate steps to remedy the concerns raised by Iridium and O3b.<sup>6</sup> To satisfy this commitment, EOS requests the deletion of the 29.1-29.5 GHz band from the Application. To harmonize the Schedule S associated with the Application, EOS requests revision of Receiving Beam IDs SUR1 and SUL1 to reflect the removal of 29.1-29.5 GHz, and further requests the deletion of Receiving Channel IDs SU29, SU30, SU31, SU32, SU33, SU34, SU35.

The proposed updates to the EOS Application frequency pairings are detailed alongside the original plans in the tables below.

Table 1. Original Modification Application Frequency Pairs

Purpose(s)	Frequency (GHz)	Application	Allocation
Feeder Link	19.70-20.20	Downlink	FSS Space-to-Earth
	29.50-30.00	Uplink	FSS Earth-to-Space
Service Link	17.70-18.60	Downlink	FSS Space-to-Earth
	18.80-20.20		
	27.50-30.00	Uplink	FSS Earth-to-Space

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<sup>5</sup> See Iridium Petition at 3; *see also* O3b Petition at 4.

<sup>6</sup> See Opposition, at 3.

Table 2. Updated Modification Application Frequency Pairs

Purpose(s)	Frequency (GHz)	Application	Allocation
Feeder Link	19.70-20.20	Downlink	FSS Space-to-Earth
	29.50-30.00	Uplink	FSS Earth-to-Space
Service Link	17.70-18.60	Downlink	FSS Space-to-Earth
	18.80-19.40		
	19.60-20.20		
	27.50-29.10	Uplink	FSS Earth-to-Space
	29.50-30.00		

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The above-requested revisions to the Application qualify as minor amendments under Section 25.116(c)(1) of the Commission's Rules, which expressly contemplates amendments to resolve frequency conflicts with authorized stations that do not create new or increased frequency conflicts.<sup>7</sup>

Please contact the undersigned if there are any questions concerning this matter.

Respectfully Submitted,

/s/

Timothy L. Bransford  
Counsel to EOS Defense Systems USA, Inc.

cc:  
Karl Kensinger  
Kerry Murray  
Diane Garfield  
Cindy Spiers

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<sup>7</sup> See 47 C.F.R. §25.116(c)(1).