

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Application of)	
)	
Ligado Networks Subsidiary LLC)	File No. SAT-MOD-_____
)	Call Sign AMSC-1
Fleet Management Notice to Modify)	
AMSC-1 Fixed-Satellite Space Station)	
License)	

FLEET MANAGEMENT NOTICE OF LIGADO NETWORKS SUBSIDIARY LLC

Ligado Networks Subsidiary LLC (“Ligado”) is licensed to operate a Mobile Satellite Service (“MSS”) satellite, MSAT-2 (call sign AMSC-1), at the 106.5°WL orbital location.¹

Ligado respectfully submits this notification pursuant to the Commission’s fleet management procedures to modify MSAT-2’s fixed-satellite space station license to relocate the satellite from 106.5°WL to 107.3°WL. A completed FCC Form 312 is attached. In addition, Ligado is providing a certification in support of this notification as required by Section 25.118(e) of the Commission’s rules.

BACKGROUND

Ligado currently operates MSAT-2 at the 106.5°WL orbital location pursuant to a 2018 modification to MSAT-2’s license, allowing Ligado to operate the satellite in an orbital location

¹ *Memorandum Opinion, Order and Authorization*, 4 FCC Rcd 6041 (1989); *remanded by Aeronautical Radio, Inc. v. FCC*, 928 F.2d 428 (D.C. Cir. 1991), *Final Decision on Remand*, 7 FCC Rcd 266 (1992), *aff’d*, *Aeronautical Radio, Inc. v. FCC*, 983 F.2d 275 (D.C. Cir. 1993); *see also* FCC File No. SAT-MOD-20180912-00070 (granted Nov. 29, 2018) (authority to move MSAT-2 to current location); FCC File No. SAT-MOD-20201201-00138 (granted Feb. 17, 2021) (extending MSAT-2 operations through Dec. 31, 2022).

under Canadian authority.² Ligado holds a separate Canadian authorization at 107.3°WL, under which it operated MSAT-1 until that satellite was deorbited pursuant to authorization from Innovation, Science and Economic Development Canada (“ISED”) in November, 2020.

Ligado plans to relocate MSAT-2 to 107.3°WL, where it will operate within the same technical parameters licensed and coordinated for MSAT-1. Because MSAT-2 currently operates as a backup satellite, it will not be necessary to transfer any current traffic, nor will any customers experience any service outages. As both MSAT-2’s current and planned orbital locations are under Canadian authority, Ligado has already asked for authorization from ISED to commence relocation, and after receiving such authorization will commence relocation operations.

CERTIFICATION OF COMPLIANCE WITH SECTION 25.118(e)

Ligado hereby certifies that this fleet management notice complies with the requirements of Section 25.118(e), as indicated below:

- (1) MSAT-2 will be relocated to a location that is within +/- 0.15° of the orbital location assigned to Ligado at 107.3°WL.
- (2) After relocation, MSAT-2 will operate within the technical parameters authorized and coordinated for MSAT-1 at the new location.
- (3) Ligado will operate MSAT-2 in compliance with all of the conditions previously imposed on the operation of MSAT-1 at the new location.

² This modification was granted pursuant to existing interagency procedures authorized by the ITU. See FCC File No. SAT-MOD-20180912-00070 (granted Nov. 29, 2018); see also ITU, Radiocommunication Bureau, *WRC-12 decisions included in the Minutes of Plenary meeting relating to space services procedures*, Circular Letter CR/333 (2012) at 2 (citing §3.12 Doc. CMR12/554); see also ITU, Radiocommunication Bureau, *Decisions of past WRCs concerning the application of the Radio Regulations*, Circular Letter CR/380 (2015) at 3 (same).

- (4) Ligado will limit operations of MSAT-2 to tracking, telemetry and command functions during the relocations and satellite drift transition period.
- (5)(i) Ligado has assessed and limited the probability of MSAT-2 becoming a source of debris as a result of collisions with large debris or other operational satellites at the new location.³
- (5)(ii) The proposed station-keeping volume of MSAT-2 following relocation will not overlap a station-keeping volume reasonably expected to be occupied by any non-Ligado satellite, including those authorized by the Commission, applied for and pending before the Commission, or otherwise the subject of an ITU filing and either in orbit or progressing towards launch.
- (6) The relocation of MSAT-2 will not result in the lapse of service for any current customer.
- (7) Not applicable.
- (8) Not applicable.

* * *

Pursuant to the Commission's fleet management policies and as described herein, Ligado notifies the Commission that it intends to relocate AMSC-1 from 106.5°WL to 107.3°WL commencing no earlier than 30 days following submission of this notification.

³ Ligado will continue to operate MSAT-2 in accordance with the orbital debris mitigation statement previously provided to the Commission. *See* Application, FCC File No. SES-MFS-20070530-00731, at Technical Appendix 32-36 (filed May 30, 2007), *granted Comtech Mobile Data Corporation*, 7 FCC Rcd 5283 (2009); *see also* FCC File No. SAT-MOD-20100412-00075 (granted Nov. 8, 2010) (granting modification to statement and waiving 47 C.F.R. §25.283(c)).

Respectfully submitted,

LIGADO NETWORKS SUBSIDIARY LLC

By: /s/ Jeffrey J. Carlisle
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March 16, 2021

Technical Certification

I, Maqbool Aliani, Senior Vice President of Spectrum Standards & Technology for Ligado Networks Subsidiary LLC, certify under penalty of perjury that:

I am the technically qualified person with overall responsibility for preparation of the technical information contained in this application. I am familiar with the requirements of Part 25 of the Commission's rules, and the information contained in the application is true and correct to the best of my knowledge and belief.

/s/ Maqbool Aliani
Maqbool Aliani

Dated: March 16, 2021