

## Attachment 1

### Description of Amendment to Application for Modification of License

#### 1.0 OVERVIEW

This application seeks to amend the pending application to modify the existing Row 44, Inc. (“Row 44”) Ku-band Earth Stations Aboard Aircraft (“ESAA”) license to add an additional point of communication – Satmex 5 at 114.9° W.L. – in addition to Intelsat 19 (“IS-19”) at 166° E.L., Satmex 8 at 116.8° W.L. and Telesat T14R at 63 ° W.L., which are already included in the application, as amended (*See* File Nos. SES-MOD-20121023-00963 & SES-AFS-20130920-00833). No other change in the technical information contained in the pending application is proposed. Accordingly, pursuant to the Commission’s Rules and consistent with prior discussions with FCC Staff in connection with its previously-filed amendment (File No. SES-AFS-20130920-00833), no FCC Form 312, Schedule B is submitted with this Amendment.<sup>1</sup> The applicant certifies that the revised operations contemplated by the Amendment otherwise fall entirely within the scope of the technical parameters, including the orbital arc range, that are specified in the already pending modification application.

Addition of the four satellites to Row 44’s existing authority will provide new coverage in both the Pacific and Atlantic Ocean regions, allowing service to international flights on trans-oceanic routes, as well as on domestic routes in North America. Except as specifically set forth herein, Row 44 seeks these modifications subject to all terms and conditions set forth in its current license (Call Sign E080100).<sup>2</sup>

Satmex 5 has been added to the FCC’s Ku-band permitted list at the 114.9° W.L. orbital location as the result of favorable action on a Petition for Declaratory Ruling. *See Satelites Mexicanos, S.A. de C.V.*, File Nos. SAT-PPL-20121218-00217 & SAT-APL-20130308-0028 (Call Sign S2589) (granted May 31, 2013). Accordingly, no additional showing pursuant to Section 25.137 of the Commission’s Rules is required. *See* 47 C.F.R. § 25.137(b).

Row 44 seeks to implement service on one or more of the satellites subject to its amended modification application during the first quarter of 2014, and respectfully requests that this amendment be placed on public notice as quickly as possible in order to facilitate this projected implementation schedule.

---

<sup>1</sup> *See* 47 C.F.R. § 25.117(c) (When filing a modification application, “[o]nly those items that change need to be specified, provided that the applicant certifies that the remaining information has not changed”).

<sup>2</sup> *See* Row 44 Inc., Radio Station Authorization, Call Sign E080100, File No. SES-MFS-20100715-00903, at 3-6 (granted Dec. 23, 2010).

## **2.0 LINK BUDGETS AND PREDICTED COVERAGE AREA**

Exhibit A provides the link budgets and predicted coverage contours for the service using Satmex 5. *See* 47 C.F.R. § 25.227(b)(4).

## **3.0 COORDINATION LETTER**

Row 44's intended operations with Satmex 5 are within the scope of operations that Satmex has coordinated with the adjacent satellite operators, and should not cause unacceptable interference into adjacent satellites operating in accordance with FCC's two-degree spacing policy. A copy of the coordination letter covering Row 44's proposed operations using Satmex 5 is attached hereto in Exhibit B. *See* 47 C.F.R. §25.227(b)(2).