

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

In the Matter of)	
)	
AC BidCo LLC)	File No. SES-AMD-_____
)	Call Sign E120106
Amendment to Application for)	
Modification of Blanket License for)	
Operation of Ku-Band Transmit/Receive)	
Earth Stations Aboard Aircraft)	

AMENDMENT

AC BidCo LLC (“AC BidCo”) hereby amends its pending modification application¹ regarding its blanket license to operate Ku-band transmit/receive earth stations aboard aircraft (“ESAAs”) on domestic and international flights.² In addition to the satellites listed in the Modification Application, AC BidCo requests that the Commission also add the ARSAT-2 spacecraft as an authorized point of communication for ESAA operations. Other than this addition, AC BidCo certifies that the information provided in the Modification Application has not changed.

AC BidCo seeks to add ARSAT-2 as a point of communication for AC BidCo’s AES1 (AeroSat) and AES2 (ThinKom) ESAA terminals pursuant to the provisions of Section 25.227(a)(2) and (b)(2). Updated tables listing the satellites to be used in the AC BidCo ESAA network and the associated ground stations are attached, along with a letter confirming

¹ See Call Sign E120106, File No. SES-MFS-20170109-00015 (the “Modification Application”).

² See Call Sign E120106, File No. SES-MFS-20160824-00738, granted Dec. 13, 2016 (the “AC BidCo ESAA License”). The ESAA license for this call sign was previously held by Gogo LLC (“Gogo”), a commonly-owned affiliate of AC BidCo. A *pro forma* assignment of the ESAA license from Gogo to AC BidCo was approved by the Commission and consummated in 2016. See File No. SES-ASG-20160714-00659, granted July 19, 2016.

that operation of the AC BidCo ESAA terminals is consistent with coordination agreements with satellites operated within six degrees of ARSAT-2.

ARSAT-2 is an Argentine-licensed satellite positioned at the 81° W.L. orbital location that has been approved for U.S. market access,³ and complete technical information regarding the satellite is therefore already on file with the Commission. AC BidCo seeks authority to use ARSAT-2 capacity for ESAA operations on a primary basis in the 14-14.5 GHz uplink spectrum and in the 11.7-12.2 GHz downlink spectrum, consistent with the ARSAT-2 Market Access Grant and the Commission's orders in the ESAA proceeding.⁴ ARSAT-2 will provide coverage of North America.

AC BidCo amends the Modification Application to add the ARSAT-2 satellite and respectfully requests that the Commission expeditiously process the application as amended.

Respectfully submitted,

AC BIDCO LLC

By: /s/ Marguerite Elias

Of Counsel

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Dated: February 8, 2017

³ *Empresa Argentina de Soluciones Satelitales S.A.*, Call Sign S2956, File No. SAT-PPL-20160304-00024, grant-stamped July 21, 2016 ("ARSAT-2 Market Access Grant").

⁴ *Revisions to Parts 2 and 25 of the Commission's Rules to Govern the Use of Earth Stations Aboard Aircraft Communicating with Fixed-Satellite Service Geostationary-Orbit Space Stations Operating in the 10.95-11.2 GHz, 11.45-11.7 GHz, 11.7-12.2 GHz and 14-14.5 GHz Frequency Bands*, Notice of Proposed Rulemaking and Report and Order, IB Docket Nos. 12-376 & 05-20, 27 FCC Rcd 16510 (2012); Second Report and Order and Order on Reconsideration, IB Docket No. 12-376, 29 FCC Rcd 4226 (2014).

**ANNEX 2:
Updated Spacecraft and Teleport Tables**

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Use in US airspace?	Satellite Operator
AMC-1	129.15W	North America	14-14.5	11.7-12.2	Yes	SES
AMC-6¹	67W	North America	14-14.5	11.7-12.2	Yes	
AMC-21	124.9W	United States	14-14.5	11.7-12.2	Yes	
ASTRA 4A	4.8E	Europe	14-14.25	11.7-12.2; 12.2-12.75	No	
SES-1	101W	North America	14-14.5	11.7-12.2	Yes	
SES-3	103W	North America	14-14.5	11.7-12.2	Yes	
SES-4	22W	Europe	14-14.5	12.5-12.75	No	
SES-6	40.5W	East Atlantic Ocean	14-14.5	10.95-11.2; 11.45-11.7	No	
		West Atlantic Ocean	14-14.5	10.95-11.2; 11.45-11.7	Yes	
Galaxy 17	91W	North America	14-14.5	11.7-12.2	Yes	Intelsat
Galaxy 28	89W	Brazil	14-14.5	11.7-12.2	No	
IS-14	45W	North and South America excludes Brazil	14-14.5	11.7-12.2	Yes	
IS-18	180E	South Pacific	14-14.5	12.25-12.75	No	
IS-19	166E	Northeast Pacific	14-14.5	12.25-12.75	Yes	
		Northwest Pacific	14-14.5	12.25-12.75	No	
		Australia				
		Southwest Pacific				
IS-20	68.5E	Middle East	14-14.5	10.95-11.2; 11.45-11.7; 12.5-12.75	No	
IS-21	58W	Brazil	14-14.5	11.7-12.2	No	
		South Atlantic Ocean	14-14.5	11.45-11.7	No	
IS-22	72.1E	Mobility from Mideast to Japan and to Australia	14-14.5	12.25-12.5	No	
IS-29e	50W	United States	14-14.5	10.95-11.7; 11.7-12.2	Yes	
IS-33e	60E	Africa, Asia, and Europe	14-14.5	10.95-11.2; 11.45-11.7; 11.7-12.2; 12.5-12.6	No	
IS-904	60E	Spot 1 - Western Russia	14-14.5	10.95-11.2; 11.45-11.7	No	
IS-907	27.5W	East Pacific	14-14.5	10.95-11.2; 11.45-11.7	Yes	

¹ This satellite is only used for communications with the ThinKom antenna system.

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Use in US airspace?	Satellite Operator
Eutelsat 115WB	114.9W	North America	14-14.5	11.7-12.2	Yes	Eutelsat
Eutelsat 117WA	116.8W	Central and South America	14-14.5	11.7-12.2	Yes	
E172A²	172E	North Pacific and Northeastern Russia	14-14.5	10.95-11.2; 11.45-11.7; 12.2-12.75	No	
T-11N	37.5W	Africa	14-14.5	10.95-11.2; 11.45-11.7; 12.5-12.75	No	Telesat
		Atlantic	14-14.5	11.45-11.7	No	
Telstar 12V (S2933)	15W	Brazil	14-14.5	11.7-12.2	No	
T-18	138E	Asia	14-14.5	12.2-12.75	No	
JCSAT-2B	154E	South Pacific	14-14.5	11.45-11.7; 12.25-12.75	Yes	JSAT
JCSAT-5A²	132E	Japan	14-14.5	12.25-12.75	No	
Yamal 300K	183E (177W)	North Pacific Ocean	14-14.5	10.95-11.2; 11.45-11.7; 12.5-12.75	Yes	Gazprom Space Systems
Yamal 401	90E	Russia	14-14.5	10.95-11.2; 11.45-11.7; 12.5-12.75	No	
Asiasat 7	105.5E	China	14-14.5	12.25-12.75	No	AsiaSat
ARSAT-2	81W	North America	14-14.5	11.7-12.2	Yes	Empresa Argentina de Soluciones Satelitales S.A.

² These satellites are only used for communications with the Aerosat antenna system.

Satellite	Teleport Location	FCC Call Sign
AMC-1	Woodbine, MD	E900448
AMC-6	Perris, CA	E940448
AMC-21	Woodbine, MD	E900448
ASTRA 4A	Betzdorf, Luxembourg	N/A
SES-1	Woodbine, MD	E920698
SES-3	Woodbine, MD	E140059
SES-4	Bristow, VA	E020071
	Bristow, VA	E000696
SES-6	Betzdorf, Luxembourg	N/A
Galaxy 17	Atlanta, GA ATL-K26	E990214
Galaxy 28	Rio de Janeiro, Brazil	N/A
IS-14	ATL teleport ATL-C06	E940333
	ATL teleport ATL-K15	E090093
IS-18	Napa teleport NAP-K22	E990224
IS-19	Perth, Australia	N/A
	Napa teleport NAP-K31	E980460
	Napa teleport NAP-C30	E980467
IS-20	Fuchsstadt, Germany	N/A
IS-21	Rio de Janeiro, Brazil	N/A
	Mobility: MTN teleport MTN-K02	E030051
IS-22	Kumsan, Korea	N/A
IS-29e	Hagerstown, MD	E030103
IS-33e	Fuchsstadt, Germany	N/A
	Moscow, Russia	N/A
IS-904	Moscow, Russia	N/A
IS-907	Hagerstown, MD	E030103
ARSAT-2	Brewster, WA	E120043
Eutelsat 115WB	Brewster, WA	E120043
Eutelsat 117WA	Brewster, WA	E060416
E172a	Khabarovsk, Russia	N/A
T-11N	Aflenz, Austria	N/A
Telstar 12V	Rio de Janeiro, Brazil	N/A
T-18	China (City TBD)	N/A
JCSAT-2B	Kapolei, HI	E010236
JCSAT-5A	Yokohama, Japan	N/A
Yamal 300K	Brewster, WA BRW-05C	E120043
Yamal 401	Moscow, Russia	N/A
Asiasat 7	Beijing, China	N/A



Federal Communications Commission
International Bureau
445 12th Street, S.W.
Washington, D.C. 20554

February 6, 2017

Re: Engineering Certification of ARSAT

To Whom It May Concern:

This letter certifies that ARSAT has been informed by SATELITES MEXICANOS, S.A DE C.V. on behalf of AC BidCo LLC that AC BidCo LLC is planning to seek a modification to its blanket authorization from the Federal Communications Commission ("FCC"), to operate two types of technically identical Ku-band transmit/receive earth stations aboard aircraft ("ESAAs"), Call Sign E120106. AC BidCo LLC seeks additional authorization for these aeronautical Ku-band earth stations to also utilize ARSAT-2 at 81° W.L. under the current ESAA rules including Section 25.227.

ARSAT certifies that the characteristics of the AC BidCo LLC ESAA terminals with ARSAT-2 is consistent with existing coordination agreements with all adjacent satellite operators within +/- 6 degrees of orbital separation from ARSAT-2. If the FCC authorizes the operations proposed by AC BidCo LLC, ARSAT will take into consideration the power density levels associated with the operations of AC BidCo LLC in all future satellite network coordination with other adjacent satellite operators, in the related frequency band and polarization, in accordance with the established international regulations, and as long as both companies are commercially related.

The confirmation provided by this means shall be limited to the information provided by SATELITES MEXICANOS, S.A. DE C.V. on behalf of AC BidCo LLC up to the present date. Should the information of SATELITES MEXICANOS, S.A. DE C.V. and/or AC BidCo LLC be modified, the present letter shall not be valid until further analysis is completed, and if required, ARSAT would provide the FCC with an updated letter reflecting any modification to the above.

ARSAT has also stated to SATELITES MEXICANOS, S.A. DE C.V. that the ESAA antennas must be installed and operated in accordance with AC BidCo LLC's representations and the terms of the AC BidCo LLC FCC license. In particular, the ESAA antennas will operate in compliance with the pointing accuracy and shutdown requirements of 47 C.F.R. Section 25.227(a) of the Commission's Rules that apply to ESAA operations.

Sincerely


Name
ARSAT Dr. Rodrigo de Loredo
Title Presidente
ARSAT

February 6th 2017
Date