

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

¹ Call Sign E120106, File No. SES-MFS-20190304-00227 (the “Modification Application”).

² Call Sign E120106, File No. SES-MFS-20180813-02152, granted Nov. 8, 2018 (the “AC BidCo ESAA License”).

Amazonas-2 is a Brazil-licensed satellite positioned at the 61° W.L. orbital location that has been approved for U.S. market access in the conventional Ku-band frequencies (11.7-12.2 GHz and 14.0-14.5 GHz).³ The technical information regarding the satellite on file with the Commission in support of the Amazonas-2 Petition, moreover, addresses not only the satellite's conventional Ku-band operations but also the 10.95-11.2 GHz extended Ku-band frequencies available on the spacecraft.⁴ AC BidCo incorporates this information by reference herein.

AC BidCo seeks authority to use Amazonas-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 Amazonas-2 Market Access Grant and the Commission's orders in the ESAA proceeding.⁵ In addition, AC BidCo seeks authority to communicate with Amazonas-2 on an unprotected basis in the 10.95-11.2 GHz downlink spectrum, consistent with the Commission's ESAA Decisions. Amazonas-2 will provide coverage of North America, including the United States.

³ *Hispanmar Satellite S.A.*, Call Sign S2793, File No. SAT-PPL-20090806-00081, ("Amazonas-2 Petition"), grant-stamped Oct. 15, 2009 ("Amazonas-2 Market Access Grant"). Hispanmar has recently notified the Commission of a planned transfer of control of its satellites with U.S. market access, but the proposed transaction would not affect the Amazonas-2 operating parameters. *See Hispanmar Satellite S.A.*, Call Signs S2793 and S2886, File No. SAT-PPL-20190321-00017, Narrative at 2.

⁴ *See, e.g.*, Amazonas-2 Petition, Section 25.114(c) Technical Information at 8-11; Section 25.114(d) Technical Information; Schedule S.

⁵ *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) (collectively, the "ESAA Decisions").

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

Respectfully submitted,

AC BIDCO LLC

By: /s/ Marguerite Elias

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Dated: April 1, 2019

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

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Use in US airspace?	Satellite Operator
AMC-1¹	130.9W	North America, Pacific Ocean	14-14.5	11.7-12.2	Yes	SES
AMC-4²	134.9W	North America, Pacific Ocean	14-14.5	11.45-11.7; 11.7-12.2	Yes	
AMC-6	83W	North America	14-14.5	11.45-11.7; 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	
SES-10	67W	North and Central America, the Gulf of Mexico, and the Caribbean	14-14.5	10.95-11.2; 11.45-11.7; 11.7-12.2	Yes	
SES-14	47.5W	North America	14-14.5	10.95-11.2; 11.45-11.7; 11.7-12.2	Yes	
SES-15	129.15W	North America, Pacific Ocean	14-14.5	10.7-11.7 11.7-12.2	Yes	

¹ This satellite is only used for communications with the Aerosat antenna system, designated AES1.

² This satellite is only used for communications with the ThinKom 2Ku antenna system, designated AES2.

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Use in US airspace?	Satellite Operator
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-37e	18W	Europe	14-14.5	10.95-11.7; 12.5-12.75	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	
Horizons 3e	169E	Asia Pacific	14-14.5	10.95-11.7 12.2-12.75	Yes	

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	
E172B¹	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	15W	Brazil	14-14.5	11.7-12.2	No	
Telstar 18/ Apstar 5	138E	Asia	14-14.5	12.2-12.75	No	
Telstar 18V	138E	Australia, New Zealand, Indonesia, and Malaysia	14-14.5	11.45-11.7	No	
JCSAT-2B	154E	South Pacific	14-14.5	11.45-11.7; 12.25-12.75	Yes	JSAT
JCSAT-3A	128E	Japan	14-14.5	12.2-12.75	No	
JCSAT-5A¹	132E	Japan	14-14.5	12.25-12.75	No	
JCSAT-110A²	110E	Indian Ocean	14-14.5	12.2-12.75	No	
Yamal 300K	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
AsiaSat 9	122E	China	14-14.5	10.95-12.75	No	
ARSAT-2	81W	North America	14-14.5	11.7-12.2	Yes	Empresa Argentina de Soluciones Satelitales S.A.
Optus D2	152E	Australia	14-14.5	12.25-12.75	No	Optus
ABS-3A	3W	North and South America	14-14.25	10.95-11.2	Yes	ABS Global
APSTAR-6C	134E	Asia	14-14.5	12.25-12.75	No	APT Mobile Satcom Limited
Amazonas-2	61W	North America	14-14.5	10.95-11.2 11.7-12.2	Yes	Hisparmar Satellite S.A.

¹ These satellites are only used for communications with the Aerosat antenna system, designated AES1.

² This satellite is only used for communications with the ThinKom 2Ku antenna system, designated AES2.

Satellite	Teleport Location	FCC Call Sign
AMC-1	Woodbine, MD	E900448
AMC-4	Brewster, WA	E120043
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
SES-10	Perris, CA	E940448
SES-14	Woodbine, MD	E170197
	Port St. Lucie, FL	E170198
SES-15	Woodbine, MD	E170138
	South Mountain, CA	E170139
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-37e	Hagerstown, MD	E040414
IS-904	Moscow, Russia	N/A
IS-907	Hagerstown, MD	E030103
Horizons 3e	Napa teleport NAP-C21	E950307

Satellite	Teleport Location	FCC Call Sign
Eutelsat 115WB	Brewster, WA	E120043
Eutelsat 117WA	Brewster, WA	E060416
E172B	Khabarovsk, Russia	N/A
T-11N	Aflenz, Austria	N/A
Telstar 12V	Rio de Janeiro, Brazil	N/A
Telstar 18/Apstar 5	China	N/A
Telstar 18V	Sydney, Australia	N/A
JCSAT-2B	Kapolei, HI	E010236
JCSAT-3A	Yokohama, Japan	N/A
JCSAT-5A	Yokohama, Japan	N/A
JCSAT-110A	Perth, Australia	N/A
Yamal 300K	Brewster, WA BRW-05C	E120043
Yamal 401	Moscow, Russia	N/A
AsiaSat-7	Beijing, China	N/A
AsiaSat-9	Beijing, China	N/A
ARSAT-2	Brewster, WA	E120043
Optus D2	Belrose, Australia	N/A
ABS-3A	Macaé, Brazil	N/A
APSTAR 6C	Beijing, China	N/A
Amazonas-2	Brewster, WA	E891020 ¹

¹ The licensee of this earth station is preparing to seek modification of its license to allow communications in the conventional Ku-band frequencies with satellites on the permitted space station list, including Amazonas-2. AC BidCo understands that any grant of ESAA authority for Amazonas-2 does not authorize communications between E891020 and the satellite, which will not be permitted to commence until the necessary modification of the E891020 license has been granted.



18 March 2019

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To whom it may concern

This letter certifies that Hispamar is aware that AC BidCo LLC ("AC BidCo") is planning to seek authorization from the Federal Communications Commission ("FCC") to operate Ku band transmit/receive terminals AES1 and AES2 for the provision of Aeronautical Mobile Satellite Service (Call Sign E120106). AC BidCo seeks additional authorization for these aeronautical Ku-band earth stations to also utilize Amazonas-2 at 61°W under the current rules for Earth Stations Aboard Aircraft (ESAA), including Section 25.227.

Hispamar certifies that the transmissions of the ESAA terminals AES1 and AES2 by AC BidCo, installed and operated in accordance with the AC BidCo application and the above conditions, will be adjusted to be in compliance with existing coordination agreements with all adjacent satellite operators within +/-6 degrees of orbital separation from Amazonas-2.

If the FCC authorizes the operations proposed by AC BidCo in its application, Hispamar will take into account the transmissions described above in all future satellite network coordination with adjacent satellite operators. AC BidCo shall comply with all such coordination agreements reached by the satellite operators.

Yours sincerely,

Cristina García de Miguel

Hispasat
Head of Orbit-Spectrum Resources & Regulation
(on behalf of Hispamar)

Date: 18 March 2019