

ATTACHMENT

Description of Amendment to Pending Modification Application

1.0 OVERVIEW

Global Eagle Telecom Licensing Subsidiary, LLC (“Global Eagle”) seeks to amend its pending modification application for its Ku-band Earth Stations Aboard Aircraft (“ESAA”) license (Call Sign E080100) for the purpose of adding an additional satellite point of communication – the SES-14 satellite (“SES-14”) located at 47.5° West Longitude. *See* File No. SES-MFS-20190312-00328. Global Eagle seeks this amendment subject to all terms and conditions set forth in its current license¹ and the operations proposed are otherwise consistent with the technical specifications set forth in its current license. Operations using the additional satellites would use both the TECOM Ku-Stream (SAA/Remote 2) and QEST Q050000 (GSAA/Remote 3) antennas.

2.0 ADDITIONAL POINT OF COMMUNICATION REQUESTED

Global Eagle requests the addition of the SES-14 satellite that is authorized under Call Sign S2974 as a Ku-band Permitted List satellite for service to the United States (*see* FCC File No. SAT-PPL-20160918-00093). The specific frequencies to be used on SES-14 satellite are registered with International Telecommunication Union by the administration of Brazil under the network identifier B-SAT-1W-2.

Complete technical information regarding the SES-14 satellite was submitted to the FCC in the proceeding authorizing the satellite’s inclusion on the Ku-band Permitted List, which is cited in the foregoing paragraph. Global Eagle therefore simply requests that its existing ESAA license be updated to reflect use of SES-14 on a primary basis for ESAA operations in the 14-14.5 GHz and 11.7-12.2 GHz bands.

The addition to the Global Eagle license of authority to communicate using SES-14 will provide additional near-term space segment capacity for Global Eagle’s ESAA network, thereby allowing it to provide greater system throughput and coverage for the provision of its in-flight Wi-Fi connectivity services to airline passengers on flights operating in the Eastern United States and between CONUS and Europe and the Caribbean. Global Eagle is concurrently seeking special temporary authority (“STA”) to permit it to operate using these same parameters on an expedited basis to begin service on or about July 17, 2019,

¹ *See* Row 44 Inc., Call Sign E080100, FCC File No. SES-MFS-20180515-00624 (Sat. Div., granted 7/17/2018).

3.0 COORDINATION CERTIFICATION **[47 C.F.R. §§ 25.227(b)(2) & 25.220(d)]**

Global Eagle's intended operations are within the scope that SES S.A. has coordinated with the adjacent satellite operators within six degrees adjacent to SES-14 in either direction along the geostationary arc and should not cause harmful interference to any of these satellites operating in accordance with FCC's two-degree spacing policy. Exhibit A attached hereto provides copies of the coordination certification letter dated July 2, 2019 covering Global Eagle's proposed operations using SES-14.

Global Eagle is aware that multiple NGSO FSS systems have been authorized to provide service to the U.S. market using Ku-band spectrum. It is prepared to enter into discussions with these operators as service is launched in the United States to establish operating parameters that permit successful co-frequency sharing. Global Eagle would modify its operations if necessary to implement any coordination agreement reached. Global Eagle acknowledges that the Commission may condition the grant of any modified license issued to it upon a requirement that it ultimately complete such coordination.

4.0 TECHNICAL DATA, LINK BUDGETS AND PREDICTED COVERAGE AREAS [47 C.F.R. § 25.227(b)(4)]

Exhibit B attached hereto includes representative link budgets and a depiction of the geographic coverage contours for operations using SES-14 at 47.5° W.L.

5.0 REVISED SPACECRAFT, FREQUENCY & BEAM COVERAGE

[See Next Page]

Table 1: Spacecraft, Frequency & Beam Coverage Table
(All Provide Some Coverage to U.S. Locations; * =Non-U.S., Permitted List Satellite)

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Satellite Operator
AMC-1	130.9 W	North America, Central America and Pacific	14.05-14.47	11.7-12.2	SES
AMC-2	84.85 W	North America, Caribbean and North Atlantic	14.05-14.47	11.7-12.2	
AMC-3	72.0 W	North America, Central America, Atlantic and Caribbean	14.05-14.47	11.7-12.2	
AMC-9	83.0 W	North America, Caribbean, Central America and North Atlantic	14.05-14.47	11.7-12.2	
SES-1	101.0 W	North America, Central America, Pacific and Caribbean	14.05-14.47	11.7-12.2	
SES-10	67.0W	North America, Central America, South Atlantic and Caribbean	14.05-14.47	11.7-12.2	
SES-14	47.5 W	North America, North Atlantic and Caribbean	14.05-14.47	11.7-12.2	
SES-15	129.0 W	North America, Central America, Caribbean and Pacific	14.05-14.47	10.7-10.95, 10.95-11.2, 11.2-11.45, 11.45-11.7, 11.7-12.2	
IS-29E	50.0 W	North America, Central America, South America, North Atlantic and Caribbean	14.05-14.47	10.95-11.2, 11.2-11.45, 11.45-11.7, 11.7-12.2, 12.2-12.5	Intelsat
Eutelsat 115 WB*	114.9 W	North America, North Atlantic and Pacific Ocean	14.05-14.47	11.7-12.2	Eutelsat
Eutelsat 133 WA*	132.85 W	North America and Pacific	14.05-14.47	11.2-11.45, 11.45-11.7, 12.5-12.75	
Telstar 12	109.2 W	North America, Gulf of Mexico and Caribbean	14.05-14.47	11.7-12.2	Telesat (Skynet)

6.0 TELEPORT UPLINK LOCATIONS

Table 2
Teleport Locations for Provision of Service within the United States

Satellite	Orbital Location	Teleport Location(s)	Site Operator	Call Sign(s)
AMC-1	130.9 W	Holmdel, NJ	GEE/MTN	E160163
AMC-2	80.85 W	N. Las Vegas, NV	Hughes	E940460
AMC-3	72.0 W	Holmdel, NJ	GEE/MTN	E160163
AMC-9	83.0 W	North Las Vegas, NV	Hughes	E940460
SES-1	101.0 W	North Las Vegas, NV	Hughes	E940460
SES-10	67.0 W	Steele Valley, CA	Level 3/ Vyvx	E950202
SES-14*	47.5 W	Holmdel, NJ	GEE/MTN	E160163
SES-15	129.0 W	South Mountain, CA	SES	E170139
IS-29E	50.0 W	Holmdel, NJ	GEE/MTN	E160163
Eutelsat 115 WB*	114.9W	Southfield (Detroit), MI	Hughes	E990170
Eutelsat 133 WA*	132.85 W	Kapolei, HI	Hawaii Pacific Teleport	E010236
Telstar 12	109.2W	South Jordan, UT	LBiSat LLC	E030342

* = Non-U.S.-licensed satellite included on Ku-band Permitted List

7.0 LICENSEE CERTIFICATION

I, Simon McLellan, Chief Engineer of Global Eagle Entertainment, Inc. (“Global Eagle”), hereby certify that Global Eagle:

- (1) will continue to comply with the requirements of paragraphs (a)(6), (a)(9), (a)(10), and (a)(11) of Section 25.227 of the Commission’s Rules and the conditions of its existing license; and
- (2) has confirmed, as shown by the SES coordination letter submitted with this application, that the ESAA operations proposed herein are within coordinated parameters for adjacent satellites up to 6 degrees away on the geostationary arc.

Simon McLellan

Simon McLellan
Chief Engineer
Global Eagle Entertainment, Inc.

July 10, 2019