

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Kymeta Corporation Application for Blanket	)	File No. SES-MOD-_____ - _____
License to Operate 5,000 Ku-Band	)	File No. SES-LIC-20170223-00195
Transmit/Receive Vehicle Mounted Earth	)	Call Sign: E170070
Stations (VMESs”), 1,000 Ku-Band	)	
Transmit/Receive Earth Stations on Vessels	)	
(“ESVs”) and 5,000 Ku-Band	)	
Transmit/Receive Fixed Earth Stations	)	

**REVISED APPLICATION FOR  
MODIFICATION OF BLANKET LICENSE**

Pursuant to Section 25.117 of the Commission’s Rules, Kymeta Corporation (“Kymeta”) files this revised application for modification of its blanket license to seek authority to operate at a maximum of 16 watts input power to the flange of the antenna. On August 24, 2017, the Commission granted Kymeta a blanket license to operate 5,000 Ku-band transmit/receive vehicle mounted earth stations (“VMES”), 1,000 Ku-band transmit/receive earth stations on vessels (“ESV”) and 5,000 Ku-band transmit/receive fixed earth stations operating in the Fixed Satellite Service. The Commission granted Kymeta authority to operate with a maximum of 8 watts input power.

This application for modification seeks authority to operate at a maximum of 16 watts input power to the flange of the antenna, and makes several corresponding changes on FCC Form 312 as follows:

E38: Total input power at antenna flange = 16.0 watts (maximum)

E40: Total EIRP for all carriers (dBW) = 45.04 dBW (maximum)

E48: Maximum EIRP per carrier (dBW): 45.04 dBW

E49: Maximum EIRP Density per carrier (dBW/4 kHz): 19.0

Kymeta's terminal complies with the off-axis EIRP power spectral density ("PSD") standards (the "off-axis mask") set forth in Sections 25.222(a)(1)(i) for ESVs, 25.226(a)(1)(i) for VMESs, and 25.218(f) for fixed earth stations. Therefore, compliance with Section 25.209 is not required. Exhibits A and B to the Technical Appendix to the original application (filed in February 2017) consist of comprehensive tables and a series of measured antenna patterns demonstrating compliance with the off-axis mask. Those measurements were calculated based on an input power of 25 watts (corresponding to 47 dBW). Kymeta did not prepare a new analysis or re-submit these Exhibits with the modification application because the input power requested in this modification application is 16 watts (corresponding to 45.04 dBW), which is *less* than the input power used to calculate the original antenna patterns.<sup>1</sup> The terminal automatically controls input power to maintain compliance with the off-axis mask.

Kymeta submits as Exhibit A an RF Safety Analysis for operations at 16 watts input power.

The remote control for the earth stations will be located at Kymeta's headquarters, 12277 134<sup>th</sup> Court, Redmond, WA 98052, telephone 855-KALONET.

---

<sup>1</sup> In its initial filing for blanket earth station authorization, Kymeta proposed a maximum input power of 25 watts. Subsequently, Kymeta amended its application to reduce the maximum input power to 8 watts. Because Kymeta complied with the off-axis mask with an input power of 25 watts, Kymeta did not submit an amended study for operations at 8 watts.

Please contact the undersigned if additional information is needed.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert S. Koppel". The signature is written in a cursive, slightly slanted style.

Robert S. Koppel  
Lukas, LaFuria, Gutierrez & Sachs, LLP  
8300 Greensboro Drive, Suite 1200  
Tysons, VA 22102  
703-584-8669  
[bkoppel@fcclaw.com](mailto:bkoppel@fcclaw.com)  
*Counsel to Kymeta Corporation*

January 30, 2018

### TECHNICAL CERTIFICATION

I, Ryan A. Stevenson, hereby certify that I am:

- the technically qualified person responsible for the preparation of the technical information contained in this Revised Application for Modification;
- that I am familiar with Part 25 of the Commission's Rules; and
- that I have either prepared or reviewed the technical information submitted in the Amendment and found it to be complete and accurate to the best of my knowledge and belief.

Signed: /s/ Ryan A. Stevenson

Dated: January 30, 2018

Ryan A. Stevenson  
Vice President and Chief Scientist  
Kymeta Corporation