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

In the Matter of		
Amendment of Application of Panasonic Avionics Corporation To Modify its Earth Stations Aboard Aircraft ("ESAA") Blanket License	)	File Nos. SES-MFS-20180122-00052, SES-AMD-20180208-00096 and SES-AMD-_____ Call Sign: E100089

Amendment of Application to Modify ESAA Blanket License

Pursuant to Section 25.116(a) of the Commission's rules, 47 C.F.R. § 25.116(a), Panasonic Avionics Corporation ("Panasonic") hereby amends its pending application[1] to modify its existing earth stations aboard aircraft ("ESAA") blanket license, Call Sign E100089,[2] by increasing the maximum power levels of its ESAA operations with the IS-33e satellite, a U.S.-licensed satellite located at the 60° E.L. orbital location. The IS-33e satellite is currently an authorized point of communication for its previously licensed Single Panel Antenna ("SPA") and Panasonic Phased Array ("PPA") ESAA terminals.

This amendment is consistent with Panasonic's pending request to operate with various previously authorized points of communication at maximum power levels higher than those currently authorized in the *ESAA Blanket License*. Panasonic provides the FCC Form 312 Schedule B for new information relating to the proposed PPA and SPA terminal operations with

[1] *See* Panasonic Avionics Corporation, File Nos. SES-MFS-20180122-00052 & SES-AMD-20180208-00096, Call Sign E100089 ("*ESAA Modification Application*").

[2] *See* Panasonic Avionics Corporation, File No. SES-LIC-20100805-00992, Call Sign E100089, and subsequent filings and modifications ("*ESAA Blanket License*"); *Panasonic Avionics Corporation Application for Authority to Operate Up to 50 Technically Identical Aeronautical Mobile-Satellite Service Aircraft Earth Stations in the 14.0-14.4 GHz and 11.7-12.2 GHz Frequency Bands*, Order and Authorization, DA 11-1480 (rel. Aug. 31, 2011).

the IS-33e satellite, and no other information provided in the *ESAA Modification Application* will change as a result of this amendment. The amendment will allow Panasonic to further enhance the capabilities of its eXConnect system, thereby improving in-flight voice and broadband Internet access to passengers and crew.

I. Discussion

In this amendment, Panasonic requests authority to operate the PPA and SPA ESAA terminals with the IS-33e satellite at power levels that are higher than those currently authorized in the *ESAA Blanket License* and that exceed the off-axis EIRP spectral density ("ESD") mask codified in Section 25.227(a)(1) of the Commission's rules. Below, Panasonic provides an overview of its operations with the IS-33e satellite.

Table 1. Satellite Point of Communication

Satellite	Licensing Admin.	Orbital Location	Downlink Freq. (GHz)[3]	ITU Region	Service To U.S.
IS-33e	U.S.	60° E	10.95-11.2; 11.45-12.2; 12.5-12.6	1, 3	No

Although Panasonic already operates the ESAA terminals with the IS-33e satellite pursuant to Section 25.227(a)(2) of the Commission's rules at off-axis ESD levels in excess of those specified in Section 25.227(a)(1), it files this amendment to permit ESAA operations at levels higher than those currently authorized. Specifically, Panasonic's new operating approach considers the location and skew angle of individual terminals to select an appropriate transmit

[3] Panasonic will continue to operate the ESAA terminals with IS-33e on a non-interference, non-protected basis in the 12.5-12.6 GHz band outside of the United States only. *See ESAA Blanket License,* Condition 90407.

power levels that maximizes throughput while ensuring compliance with the coordinated levels of the serving satellite.

The increased power levels are consistent with the coordinated parameters of IS-33e and will to ensure that Panasonic's ESAA operations are optimized for performance with this satellite. Panasonic submits an updated certification letter from the operator of IS-33e, Intelsat License LLC, confirming that it has reviewed the technical characteristics of Panasonic's ESAA terminal operations and that such operations will not result in unacceptable interference to other satellites within +/- 6 degrees of the satellite.[4]

II. Public Interest Statement

Grant of the requested modification, including this amendment, will serve the public interest by improving the overall operational capabilities of the eXConnect system. Increasing the ESAA power levels associated with the IS-33e satellite as described herein will help optimize terminal performance and allow Panasonic to enhance its network offerings with next-generation satellite services to consumers. This will provide a direct benefit to U.S. consumers who will be able to access significantly improved in-flight broadband applications and will further enhance competition and U.S. leadership in aeronautical broadband connectivity services.

III. Conclusion

Based on the foregoing, Panasonic respectfully requests that the Commission grant the pending application to modify the *ESAA Blanket License*, Call Sign E100089, as amended herein.

[4] *See* Satellite Operator Certification Letter.