

September 14, 2020

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Attention: International Bureau

**Re: Form 312 Application for New Satellite Earth Station
Amendments to File Nos. SES-LIC-20200821-00897
and SES-LIC-20200821-00898**

Dear Ms. Dortch:

GlobeCast America, Incorporated (“Globecast”), pursuant to Sections 25.116(a) and (e) of the Commission’s Rules, hereby amends the above-captioned applications. This is a minor amendment to the applications.

In its applications filed August 21, 2020, Globecast reported that it was taking corrective measures regarding monitoring of Globecast’s regulatory obligations. Attached is a copy of a letter dated September 11, 2020, and signed by Globecast CEO Eddie Ferraro and its CTO Chris Pulis, outline the Regulatory Compliance Plan that Globecast has adopted and begun implementing. Mr. Pulis has been designated the Regulatory Compliance Officer and is the Globecast executive charged with implementation of the plan.

If you have any questions concerning this please contact me at +1-202-871-3772 or stephen.diaz.gavin@rimonlaw.com.

Very truly yours,



Stephen Díaz Gavin
Counsel to GlobeCast America, Incorporated

Attachment



Marlene Dortch, Secretary
Federal Communications Commission
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Washington DC, 20554

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11-SEPT-2020

Dear Ms Dortch,

GlobeCast America, Incorporated (the "Company") has established a Regulatory Compliance Program (the "Program"). The Program will be in place and effective as of September 30, 2020.

The Company's CEO and the Managing Director for the Americas of the Company's parent, Eddie Ferraro, has appointed a Regulatory Compliance Officer ("RCO") to manage the Program. This "RCO" is Chris Pulis the Chief Technology Officer for Globecast and he reports directly to Mr. Ferraro.

The RCO is responsible for developing, implementing, and administering the Program and will ensure that the Company complies with all duties, responsibilities and filing deadlines under rules and policies of the Federal Communications Commission ("FCC"). This will include outreach to the Company's engineering and field people responsible for operations of the Company's FCC-authorized antennas and transmitters to ensure that they are operated in compliance with all relevant FCC rules and policies.

To ensure the effectiveness of the Program, the Company will establish a database for all FCC-related compliance matters, including information related to the license expiration/renewal dates (the "Regulatory Database"). The RCO will be responsible for monitoring the Regulatory Database, which shall include copies of all the Company's FCC authorizations to ensure that any and all needed modifications are promptly requested from the FCC. The Regulatory Database will be created in such a way as to provide the RCO and company management a six-month alert prior to the expiration of any authorization (with a shorter time period for any Special Temporary Authorization) to ensure that any license renewals are promptly and timely sought. The Company will also prepare a Compliance Manual setting out the Company's regulatory obligations, including keeping all authorizations current, as well as include an explanation of the Company's internal procedures and policies, such as the

Regulatory Database designed to ensure that the Company operates in full compliance with the FCC's rules and policies.

The Company will work with legal and engineering counsel to develop the Compliance Manual. Globecast will periodically review and revise the Compliance Manual, as necessary, to ensure that the information set forth in the manual remains current, complete, accurate, and effective.

Within ninety (90) days of the establishment of the Program, Globecast will provide a progress report to the Commission regarding the Program.

The progress report shall include a certification by the RCO that he has personal knowledge that the Company: (i) has established and implemented the Program, including the Regulatory Database, and (ii) has utilized the operating procedures since the implementation of the Program. The RCO's certification shall be accompanied by a statement explaining the basis for such certification and must comply with section 1.16 of the FCC Rules and be subscribed to as true under penalty of perjury in substantially the form set forth therein.


The Company's CEO shall also certify that he has reviewed each compliance report and that, based on his or her knowledge, the compliance report does not contain any untrue statement of a material fact, does not omit to state a material fact necessary to make the statements made therein, and is not misleading with respect to the Report. The Company shall submit an updated compliance report on the one-year anniversary of the first filing for the next three (3) years.

Kind Regards,

A handwritten signature in black ink, appearing to read "Eddie Ferraro", is written over a horizontal line.

Eddie Ferraro
Managing Director

9/11/2020

A handwritten signature in black ink, appearing to read "Chris Pulis", is written over a horizontal line.

Chris Pulis
CTO

9/11/2020