

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

Amendment of Application of NewCom      ) Call Sign: E050018  
International, Inc. to Modify its Fixed    )  
Earth Station License                    ) File No. SES-AMD-\_\_\_\_\_

**AMENDMENT OF APPLICATION TO MODIFY FIXED EARTH STATION LICENSE**

Pursuant to Section 25.116 of the rules of the Federal Communications Commission (the “FCC” or “Commission”), 47 C.F.R. § 25.116, Newcom International Inc. (“NewCom or “Speedcast”)<sup>1</sup> seeks to amend its pending application to modify its fixed earth station license,<sup>2</sup> Call Sign E050018, by: (1) adding one new earth station – a 2.4m Prodelin Model 1251 – for transmit-only operations in the 5.925-6.425 GHz band; (2) adding one new earth station – a 13m Vertex Model K13K – for operations in the 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) bands; and (3) making certain minor administrative corrections to the license. The proposed modification, including this amendment, will accelerate Speedcast’s initiative to streamline ground station deployments nationwide and will generally improve the overall quality of service for diverse U.S. customers and commercial activities.

**I. DISCUSSION**

**a. New Earth Stations**

This amendment adds two (2) new earth stations to the *Miami Teleport Modification Application*. First, the 2.4m Prodelin is on the Commission’s Non-Routine Antenna List and has

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<sup>1</sup> NewCom recently transferred control of the subject license to Speedcast Americas Inc., its parent company. (See File No. SES-T/C-20160121-00093).

<sup>2</sup> See NewCom International Inc., File No. SES-MOD-20190225-00190, Call Sign E050018 (“*Miami Teleport Modification Application*”); see also NewCom International Inc., File No. SES-RWL-20200219-00169, Call Sign E050018.

been previously approved to operate in the 5.925-6.425 GHz band at higher EIRP spectral density levels than those sought herein.<sup>3</sup> Although the 2.4m Prodelin does not comply with the gain mask in Section 25.209 of the Commission's rules, as a means to mitigate the potential for increased interference, Speedcast will operate the earth station at EIRP and EIRP spectral density levels below those currently authorized in the subject license and in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules.<sup>4</sup>

Second, Speedcast will similarly operate the 13m Vertex in the 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) at EIRP spectral density levels well below those authorized in the subject license, at all times in compliance with the relevant EIRP spectral density mask in Section 25.218(f) of the Commission's rules.<sup>5</sup> Therefore, both the 2.4m Prodelin and 13m Vertex are eligible for routine processing under the Commission's rules because they will operate in conformance with the routine uplink parameters specified in Section 25.218 of the Commission's rules. As demonstrated in the amendment materials, operation of the additional earth stations will be fully consistent with the Commission's spectrum management policies, including two-degree satellite spacing, and will not adversely affect the operations of other spectrum users. Speedcast provides the FCC Form 312 Schedule B and Technical Appendix for relevant information relating to the proposed operations, including frequencies and power levels, a radiation hazard analysis and a frequency coordination report.<sup>6</sup>

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<sup>3</sup> See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>; e.g., Intelsat LLC, File No. SES-LIC-20080717-00949, Call Sign E080170.

<sup>4</sup> See 47 C.F.R. § 25.218(d).

<sup>5</sup> See 47 C.F.R. § 25.218(f).

<sup>6</sup> Speedcast notes that the frequency coordination report for the 2.4m Prodelin was prepared using worst-case scenario power levels and, in reality, Speedcast will operate the antenna at a much lower EIRP spectral density level (see Form 312 Schedule B).

**b. Temporary Freeze on FSS Applications in the 3.7-4.2 GHz band**

Speedcast does not seek authority to operate in C-band receive frequencies from 3.7-4.2 GHz. As the Commission is aware, effective as of April 19, 2018, the Commission released a Public Notice placing a temporary freeze on the filing of all new or modification applications for earth stations in the 3.7-4.2 GHz band.<sup>7</sup> Accordingly, Speedcast does not seek to license receive operations in the 3.7-4.2 GHz band for the 2.4m Prodelin antenna. Speedcast understands that it will receive no protection for its C-band receive operations, and will operate on an unprotected, non-interference basis at all times to ensure compliance with the Commission’s C-band receive freeze.

**c. Frequency Coordination**

Speedcast engaged Comsearch to perform frequency coordination analysis for each new earth station, which was completed on February 14, 2020. Pursuant to Sections 25.115(c)(2)(ii) and 25.203 of the Commission’s rules, 47 C.F.R. §§ 25.115(c)(2)(ii) and 25.203, Comsearch has conducted a coordination analysis on behalf of Speedcast that considers all existing, proposed and prior coordinated microwave facilities within the contours of the earth stations at the Miami facility.

As demonstrated in the attached frequency coordination report, as coordinated and limited,<sup>8</sup> there is no potential for interference between other users of the C-band spectrum and the operations

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<sup>7</sup> See Public Notice, *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band, 90-Day Window to File Applications for Earth Stations Currently Operating in the 3.7-4.2 GHz Band*, DA 18-398 (rel. on April 19, 2018) (“*Temporary Freeze Public Notice*”).

<sup>8</sup> As demonstrated in the frequency coordination report and Form 312 Schedule B, Speedcast will limit its operations to certain segments of the 5.925-6.425 GHz band to eliminate the potential for interference into authorized co-frequency operations.

of the 2.4m Prodelin at the Miami facility and Speedcast's proposed operations are fully compatible with other FCC-licensed operations in the band. All potential interference cases that were identified have been resolved through operational limitations, and Comsearch has concluded that the site will operate satisfactorily with the common carrier microwave environment. Speedcast will coordinate any additional operations prior to bringing them into operation under the license.

#### **d. Administrative Corrections**

As part of this amendment and underlying *Miami Teleport Modification Application*, Speedcast seeks to make two minor administrative corrections to the existing license. First, Speedcast updates the manufacturer and model of the previously authorized Antenna "ES 5KU." Antenna "ES 5KU" is incorrectly identified as a 3.8m Vertex Model 1383; the correct manufacturer and model for Antenna "ES 5KU" is a 3.8m Prodelin Model 1385. No other information or earth station operating parameters are changing, this is only a clerical correction.

Second, Speedcast seeks to remove the previously authorized Antenna "ES 6KU" – a 4.5m Vertex Model ES45MP – from the license. The antenna is decommissioned and is no longer operational, and Speedcast does not intend to recommence services using Antenna "ES 6KU." The corrections sought herein will ensure that Speedcast's fixed earth station authorization accurately reflects its existing operations at the Miami facility.

## **II. Public Interest**

The additional changes included in this amendment will serve the public interest by allowing Speedcast to more efficiently restructure its ground station operations by upgrading certain facilities, which will improve the overall quality of service provided to its diverse customer base. This, in turn, will further facilitate improved satellite services to companies and personnel

in U.S. industries that rely on satellite connectivity for critical operational and employee support at remote locations that may be unable to obtain communications services through alternative means. Moreover, adding the 2.4m Prodelin and 13m Vertex to the *Miami Teleport Modification Application* will allow Speedcast to provide more flexible services to its customers in the United States by accelerating its deployment of next-generation services and equipment. The new earth stations added in this amendment will be fully consistent with the Commission's spectrum management policies, including two-degree satellite spacing, and will not adversely affect the operations of other spectrum users.

### **III. CONCLUSION**

Based on the foregoing, Speedcast respectfully requests that the Commission grant the *Miami Teleport Modification Application*, including this amendment to add two (2) new earth stations and make certain minor administrative corrections.