

Exhibit D

ESV Geographic Area of Operation

GCI Communication Corp (“GCI”) intends to operate the equipment associated with this ESV application on vessels operating in US channels and waterways within the bounds of the US Exclusive Economic Zone in the Atlantic Ocean, the Pacific Ocean, the Arctic Ocean and the Gulf of Mexico as detailed in the attached reference map (Figure 1).

Additionally, per 47 C.F.R. Ch. 1 §25.222(c) and 47 C.F.R. Ch. 1 §25.222(d) (restated below), GCI recognizes and will abide by the requirement to cease operations of the ESV equipment associated with this application in the specified proximity of NASA TDRSS facilities and certain radio observatories.

47 C.F.R. Ch. 1 §25.222(c)

Requirement: “Operations of ESVs in the 14.0–14.2 GHz (Earth-to-space) frequency band within 125 km of the NASA TDRSS facilities on Guam (located at latitude: 13°36’55” N, longitude 144°51’22” E) or White Sands, New Mexico (latitude: 32°20’59” N, longitude 106°36’31” W and latitude: 32°32’40” N, longitude 106°36’48” W) are subject to coordination through the National Telecommunications and Information Administration (NTIA) Interdepartment Radio Advisory Committee (IRAC). When NTIA seeks to provide similar protection to future TDRSS sites that have been coordinated through the IRAC Frequency Assignment Subcommittee process, NTIA will notify the Commission that the site is nearing operational status. Upon public notice from the Commission, all Ku-band ESV operators must cease operations in the 14.0–14.2 GHz band within 125 km of the new TDRSS site until after NTIA/IRAC coordination for the new TDRSS facility is complete. ESV operations will then again be permitted to operate in the 14.0–14.2 GHz band within 125 km of the new TDRSS site, subject to any operational constraints developed in the coordination process.”

Declaration: GCI will cease operations of the ESV equipment associated with this application within the areas specified above.

47 C.F.R. Ch. 1 §25.222(d)

Requirement: “Operations of ESVs in the 14.47–14.5 GHz (Earth-to-space) frequency band within (a) 45 km of the radio observatory on St. Croix, Virgin Islands (latitude 17°46’ N, longitude 64°35’ W); (b) 125 km of the radio observatory on Mauna Kea, Hawaii (at latitude 19°48’ N, longitude 155°28’ W); and (c) 90 km of the Arecibo Observatory on Puerto Rico (latitude 18°20’46” W, longitude 66°45’11” N) are subject to coordination through the National Telecommunications and Information Administration (NTIA) Interdepartment Radio Advisory Committee (IRAC).”

Declaration: GCI will cease operations of the ESV equipment associated with this application within the areas specified above.



Figure 1: GCI ESG Geographic Area of Operation