Exhibit A

Compliance with 47 C.F.R. Ch. 1 §25.222 (2011 version)

The table below details how GCI Communication Corp ("GCI") meets each of the requirements in 47 C.F.R. Ch. 1 §25.222 (2011 version) either by stating how GCI will comply or by referencing the appropriate exhibit in this application demonstrating such compliance.

47 C.F.R. Ch. 1 §25.222 (2011) Requirement	Compliance
(a) The following ongoing requirements govern all ESV licensees and operations in the 10.95–11.2 GHz (space-to-Earth), 11.45–11.7 GHz (space-to-Earth), 11.7–12.2 GHz (space-to-Earth) frequency bands and 14.0–14.5 GHz (Earth-to-space) bands transmitting to GSO satellites in the fixed-satellite service. ESV licensees must comply with the requirements in either paragraph (a)(1) or (a)(2) of this section and all of the requirements set forth in paragraphs (a)(3) through (a)(7) of this section. Paragraph (b) of this section identifies items that must be included in the application for ESV operations to demonstrate that these ongoing requirements will be met.	GCI affirms that it will operate the ESV system associated with this application in compliance with the requirements set forth in (a)(1) for which the off-axis EIRP spectral densities are lower than or equal to the levels in (a)(1)(i) of this section.
(1) The following requirements shall apply to an ESV that uses transmitters with off-axis effective isotropically radiated power (EIRP) spectral-densities lower than or equal to the levels in paragraph (a)(1)(i)(A) of this section. An ESV, or ESV system, operating under this section shall provide a detailed demonstration as described in paragraph (b)(1) of this section. The ESV transmitter also must comply with the antenna pointing and cessation of emission requirements in paragraphs (a)(1)(ii) and (a)(1)(iii) of this section.	Please see response to (a) above and Exhibit C of this application.
(i) An ESV system shall not exceed the off-axis EIRP spectral-density limits and conditions defined in paragraphs (a)(1)(i)(A) through (a)(1)(i)(D) of this section.	Please see response to (a) above and Exhibit C of this application.

(A) The off-axis EIRP spectral-density emitted from the ESV, in the plane of the GSO as it appears at the particular earth station location, shall not exceed the following values:
 	
`15-10log(N)-25logΘ ... dBW/4 kHz ... for ... 1.5° ≤ Θ ≤ 7°`
`-6-10log(N) .......... dBW/4 kHz ... for ... 7° < Θ ≤ 9.2°`
`18-10log(N)-25logΘ ... dBW/4 kHz ... for ... 9.2° < Θ ≤ 48°`
`-24-10log(N) ......... dBW/4 kHz ... for ... 48° < Θ ≤ 85°`
`-14-10log(N) ......... dBW/4 kHz ... for ... 85° < Θ ≤ 180°`
 	
Where theta (Θ) is the angle in degrees from the line connecting the focal point of the antenna to the orbital location of the target satellite, the plane of the GSO is determined by the focal point of the antenna and the line tangent to the arc of the GSO at the orbital location of the target satellite. For ESV networks using frequency division multiple access (FDMA) or time division multiple access (TDMA) techniques, N is equal to one. For ESV networks using multiple co-frequency transmitters that have the same EIRP, N is the maximum expected number of co-frequency simultaneously transmitting ESV earth stations in the same satellite receiving beam. For the purpose of this section, the peak EIRP of an individual sidelobe may not exceed the envelope defined above for Θ between 1.5° and 7.0°. For q greater than 7.0°, the envelope may be exceeded by no more than 10% of the sidelobes, provided no individual sidelobe exceeds the envelope given above by more than 3 dB.
	Please see response to (a) above and Exhibit C of this application.

47 C.F.R. Ch. 1 §25.222 (2011) Requirement (Cont'd)	Compliance

(B) In all directions other than along the GSO, the off-axis EIRP spectraldensity for co-polarized signals emitted from the ESV shall not exceed the following values:
`18-10log(N)-25logΘ .... dBW/4 kHz ... for ... 3.0° ≤ Θ ≤ 48°`
`-24-10log(N) ......... dBW/4 kHz ... for ... 48° < Θ ≤ 85°`
`-14-10log(N) ......... dBW/4 kHz ... for ... 85° < Θ ≤ 180°`
Where Θ and N are defined in paragraph (a)(1)(i)(A) of this section. This off-axis EIRP spectral-density applies in any plane that includes the line connecting the focal point of the antenna to the orbital location of the target satellite with the exception of the plane of the GSO as defined in paragraph (a)(1)(i)(A) of this section. For the purpose of this section, the envelope may be exceeded by no more than 10% of the sidelobes provided no individual sidelobe exceeds the gain envelope given above by more than 6 dB. The region of the main reflector spillover energy is to be interpreted as a single lobe and shall not exceed the envelope by more than 6 dB.
	Please see response to (a) above and Exhibit C of this application.

(C) In all directions, the off-axis EIRP spectral-density for cross-polarized signals emitted from the ESV shall not exceed the following values:
`5-10log(N)-25logΘ .... dBW/4 kHz ... for ... 1.8° ≤ Θ ≤ 7.0°`
`-16-10log(N) ........ dBW/4 kHz ... for ... 7.0° < Θ ≤ 9.2°`
Where Θ and N are defined as set forth in paragraph (a)(1)(i)(A) of this section. This EIRP spectral-density applies in any plane that includes the line connecting the focal point of the antenna to the target satellite.
	Please see response to (a) above and Exhibit C of this application.

(D) For non-circular ESV antennas, the major axis of the antenna will be aligned with the tangent to the arc of the GSO at the orbital location of the target satellite, to the extent required to meet the specified off-axis EIRP spectral-density criteria.	Please see response to (a) above and Exhibit C of this application.
(ii) Each ESV transmitter must meet one of the following antenna pointing requirements: (A) Each ESV transmitter shall maintain a pointing error of less than or equal to 0.2° between the orbital location of the target satellite and the axis of the main lobe of the ESV antenna, or (B) Each ESV transmitter shall declare a maximum antenna pointing error that may be greater than 0.2° provided that the ESV does not exceed the off-axis EIRP spectral-density limits in paragraph (a)(1)(i) of this section, taking into account the antenna pointing error.	Please refer to the Declaration of Conformance by Cobham SATCOM / Sea Tel (Paragraph #'s 4 and 5) that is attached as Exhibit C of this application.
(iii) Each ESV transmitter must meet one of the following cessation of emission requirements: (A) For ESVs operating under paragraph (a)(1)(ii)(A) of this section, all emissions from the ESV shall automatically cease within 100 milliseconds if the angle between the orbital location of the target satellite and the axis of the main lobe of the ESV antenna exceeds 0.5°, and transmission will not resume until such angle is less than or equal to 0.2°, or (B) For ESV transmitters operating under paragraph (a)(1)(ii)(B) of this section, all emissions from the ESV shall automatically cease within 100 milliseconds if the angle between the orbital location of the target satellite and the axis of the main lobe of the ESV antenna exceeds the declared maximum antenna pointing error and shall not resume transmissions until such angle is less than or equal to the declared maximum antenna pointing error.	Please refer to the Declaration of Conformance by Cobham SATCOM / Sea Tel (Paragraph #'s 4 and 5) that is attached as Exhibit C of this application.

47 C.F.R. Ch. 1 §25.222 (2011) Requirement (Cont'd)	Compliance
(2) The following requirements shall apply to an ESV that uses off-axis EIRP spectral-densities in excess of the levels in paragraph (a)(1)(i) of this section. An ESV, or ESV system, operating under this section shall file certifications and provide a detailed demonstration as described in paragraph (b)(2) of this section. (i) The ESV shall transmit only to the target satellite system(s) referred to in the certifications required by paragraph (b)(2) of this section. (ii) If a good faith agreement cannot be reached between the target satellite operator and the operator of a future satellite that is located within 6 degrees longitude of the target satellite, the ESV operator shall accept the power-density levels that would accommodate that adjacent satellite. (iii) The ESV shall operate in accordance with the off-axis EIRP spectral densities that the ESV supplied to the target satellite operator in order to obtain the certifications listed in paragraph (b)(2) of this section. The ESV shall automatically cease emissions within 100 milliseconds if the ESV transmitter exceeds the off-axis EIRP spectral-densities supplied to the target satellite operator.	GCI affirms that it *** will not *** operate the ESV system associated with this application in compliance with the requirements set forth in (a)(2) for which the off-axis EIRP spectral densities are in excess of the levels in (a)(1)(i) of this section.
(3) There shall be a point of contact in the United States, with phone number and address, available 24 hours a day, seven days a week, with authority and ability to cease all emissions from the ESVs, either directly or through the facilities of a U.S. Hub or a Hub located in another country with which the United States has a bilateral agreement that enables such cessation of emissions.	GCI details contact information in Exhibit F of this application.
(4) For each ESV transmitter, a record of the ship location (i.e., latitude/longitude), transmit frequency, channel bandwidth and satellite used shall be time annotated and maintained for a period of not less than 1 year. Records will be recorded at time intervals no greater than every 20 minutes while the ESV is transmitting. The ESV operator will make this data available upon request to a coordinator, fixed system operator, fixed-satellite system operator, NTIA, or the Commission within 24 hours of the request.	GCI details records storage in Exhibit G of this application.
(5) ESV operators communicating with vessels of foreign registry must maintain detailed information on each vessel's country of registry and a point of contact for the relevant administration responsible for licensing ESVs.	GCI details contact information in Exhibit F and records storage in Exhibit G of this application.
(6) ESV operators shall control all ESVs by a Hub earth station located in the United States, except that an ESV on U.S.-registered vessels may operate under control of a Hub earth station location outside the United States provided the ESV operator maintains a point of contact within the United States that will have the capability and authority to cause an ESV on a U.S.-registered vessel to cease transmitting if necessary.	GCI details contact information in Exhibit F of this application.
(7) In the 10.95–11.2 GHz (space-to-Earth) and 11.45–11.7 GHz (space-to-Earth) frequency bands ESVs shall not claim protection from interference from any authorized terrestrial stations to which frequencies are either already assigned, or may be assigned in the future.	GCI details the details of ESV Operating Frequencies in Exhibit E of this application.

47 C.F.R. Ch. 1 §25.222 (2011) Requirement (Cont'd)	Compliance
(b) Applications for ESV operation in the 14.0–14.5 GHz (Earth-to-space) band to GSO satellites in the fixed-satellite service must include, in addition to the particulars of operation identified on Form 312, and associated Schedule B, the applicable technical demonstrations in paragraphs (b)(1) or (b)(2) of this section and the documentation identified in paragraphs (b)(3) through (b)(5) of this section.	The applicable technical demonstrations and other affirmations are contained in the FCC Form 312 and Exhibits associated with this application.
(1) An ESV applicant proposing to implement a transmitter under paragraph (a)(1) of this section must demonstrate that the transmitter meets the off-axis EIRP spectral-density limits contained in paragraph (a)(1)(i) of this section. To provide this demonstration, the application shall include the tables described in paragraph (b)(1)(i) of this section or the certification described in paragraph (b)(1)(ii) of this section. The ESV applicant also must provide the value N described in paragraph (a)(1)(i)(A) of this section. An ESV applicant proposing to implement a transmitter under paragraph (a)(1)(ii)(A) of this section must provide the certifications identified in paragraph (b)(1)(iii) of this section. An ESV applicant proposing to implement a transmitter under paragraph (a)(1)(ii)(B) of this section must provide the demonstrations identified in paragraph (b)(1)(iv) of this section.	Please refer to Exhibit C of this application for the applicable technical demonstrations and affirmations associated with this part.
(i) Any ESV applicant filing an application pursuant to paragraph (a)(1) of this section must file three tables showing the off-axis EIRP level of the proposed earth station antenna in the direction of the plane of the GSO; the co-polarized EIRP in the elevation plane, that is, the plane perpendicular to the plane of the GSO; and cross polarized EIRP. In each table, the EIRP level must be provided at increments of 0.1° for angles between 0° and 10° off-axis, and at increments of 5° for angles between 10° and 180° off-axis.	Not required. Please see Exhibit C of this application for a certification of antenna performance in accordance with (b)(1)(ii) of this section.
(A) For purposes of the off-axis EIRP table in the plane of the GSO, the off-axis angle is the angle in degrees from the line connecting the focal point of the antenna to the orbital location of the target satellite, and the plane of the GSO is determined by the focal point of the antenna and the line tangent to the arc of the GSO at the orbital position of the target satellite.	Please see response to (b)(1)(i) above and Exhibit C of this application.
(B) For purposes of the off-axis co-polarized EIRP table in the elevation plane, the off-axis angle is the angle in degrees from the line connecting the focal point of the antenna to the orbital location of the target satellite, and the elevation plane is defined as the plane perpendicular to the plane of the GSO defined in paragraph (b)(1)(i)(A) of this section.	Please see response to (b)(1)(i) above and Exhibit C of this application.
(C) For purposes of the cross-polarized EIRP table, the off-axis angle is the angle in degrees from the line connecting the focal point of the antenna to the orbital location of the target satellite and the plane of the GSO as defined in paragraph (b)(1)(i)(A) of this section will be used.	Please see response to (b)(1)(i) above and Exhibit C of this application.
(ii) A certification, in Schedule B, that the ESV antenna conforms to the gain pattern criteria of § 25.209(a) and (b), that, combined with the maximum input power density calculated from the EIRP density less the antenna gain, which is entered in Schedule B, demonstrates that the off-axis EIRP spectral density envelope set forth in paragraphs (a)(1)(i)(A) through (a)(1)(i)(C) of this section will be met under the assumption that the antenna is pointed at the target satellite.	Please see the FCC Form 312 and Exhibit C this application.

47 C.F.R. Ch. 1 §25.222 (2011) Requirement (Cont'd)	Compliance
(iii) An ESV applicant proposing to implement a transmitter under paragraph (a)(1)(ii)(A) of this section, must provide a certification from the equipment manufacturer stating that the antenna tracking system will maintain a pointing error of less than or equal to 0.2 between the orbital location of the target satellite and the axis of the main lobe of the ESV antenna and that the antenna tracking system is capable of ceasing emissions within 100 milliseconds if the angle between the orbital location of the target satellite and the axis of the main lobe of the ESV antenna exceeds 0.5°.	Please refer to the Declaration of Conformance by Cobham SATCOM / Sea Tel (Paragraph #'s 4 and 5) that is attached as Exhibit C of this application.
(iv) An ESV applicant proposing to implement a transmitter under paragraph (a)(1)(ii)(B) of this section must: (A) Declare, in their application, a maximum antenna pointing error and demonstrate that the maximum antenna pointing error can be achieved without exceeding the off-axis EIRP spectral-density limits in paragraph (a)(1)(A) of this section; and (B) Demonstrate that the ESV transmitter can detect if the transmitter exceeds the declared maximum antenna pointing error and can cease transmission within 100 milliseconds if the angle between the orbital location of the target satellite and the axis of the main lobe of the ESV antenna exceeds the declared maximum antenna pointing error, and will not resume transmissions until the angle between the orbital location of the target satellite and the axis of the main lobe of the ESV antenna is less than or equal to the declared maximum antenna pointing error.	Please refer to the Declaration of Conformance by Cobham SATCOM / Sea Tel (Paragraph #'s 4 and 5) that is attached as Exhibit C of this application.
(2) An ESV applicant proposing to implement a transmitter under paragraph (a)(2) of this section and using off-axis EIRP spectral-densities in excess of the levels in paragraph (a)(1)(i) of this section shall provide the following certifications and demonstration as exhibits to its earth station application: (i) A statement from the target satellite operator certifying that the proposed operation of the ESV has the potential to create harmful interference to satellite networks adjacent to the target satellite(s) that may be unacceptable. (ii) A statement from the target satellite operator certifying that the power-density levels that the ESV applicant provided to the target satellite operator are consistent with the existing coordination agreements between its satellite(s) and the adjacent satellite systems within 6° of orbital separation from its satellite(s). (iii) A statement from the target satellite operator certifying that it will include the power-density levels of the ESV applicant in all future coordination agreements. (iv) A demonstration from the ESV operator that the ESV system is capable of detecting and automatically ceasing emissions within 100 milliseconds when the transmitter exceeds the off-axis EIRP spectral-densities supplied to the target satellite operator.	GCI affirms that it *** will not *** operate the ESV system associated with this application in compliance with the requirements set forth in (a)(2) for which the off-axis EIRP spectral densities are in excess of the levels in (a)(1)(i) of this section.
(3) There shall be an exhibit included with the application describing the geographic area(s) in which the ESVs will operate.	Please see Exhibit D of this application.
(4) The point of contact referred to in paragraph (a)(3) of this section and, if applicable paragraph (a)(6) of this section, must be included in the application.	Please see Exhibit F of this application.

47 C.F.R. Ch. 1 §25.222 (2011) Requirement (Cont'd)	Compliance
(5) ESVs that exceed the radiation guidelines of § 1.1310 of this chapter, Radiofrequency radiation exposure limits, must provide, with their environmental assessment, a plan for mitigation of radiation exposure to the extent required to meet those guidelines.	Please see Exhibit B of this application.
(c) 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.	Please see Exhibit D of this application.
(d) 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).	Please see Exhibit D of this application.