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August 14, 2015

## **BY EFILE**

Marlene H. Dortch Federal Communications Commission 445 12<sup>th</sup> St., SW Washington, DC 20554

Re: OET File No. 0124-EX-ML-2015

IBFS File No. SES-LIC-20150616-00357 (Call Sign E150095)

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.65, Higher Ground LLC ("Higher Ground"), by its counsel, provides the following additional information with respect to its above-referenced applications for an experimental license modification and a blanket earth station license.

Higher Ground is committed to ensuring that its interference protection regime for C-band point-to-point operations accounts for all point-to-point operational fixed licensees, operational fixed applicants operating pursuant to pre-authorization construction, and temporary fixed licensees. To that end, Higher Ground has entered an agreement with a frequency coordinator that will enable it to incorporate temporary fixed licensees' locations of operation into its database and establish protection zones for those temporary fixed operations, even if such location information is not submitted to the Universal Licensing System database. This arrangement will serve to provide Higher Ground with notification of existing and future temporary fixed locations that may be near SatPaq devices intending to operate under either experimental authority or the proposed blanket earth station authorization.

For purposes of the experimental modification application, Higher Ground also proposes to provide notice of its intent to operate SatPaq devices to the nearby point-to-point operational fixed licensees, operational fixed applicants operating pursuant to pre-authorization construction, and temporary fixed licensees. Such notification will include a 24/7 point-of-contact with capability to control SatPaq operations.

Higher Ground is eager to promptly gain modified experimental authority so that it can prepare to engage in expanded SatPaq testing in early Fall 2015, prior to the foliage changes on the East

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Coast. This will permit Higher Ground to assess SatPaq operations under diverse conditions. Under its existing experimental license, Higher Ground has conducted SatPaq testing in the authorized Palo Alto, California area and limited SatPaq testing for a short period in the authorized Jackson, California area. Higher Ground is ready to expand its testing to additional locations and seeks prompt action on its pending experimental modification application to allow this to happen.

Please direct any additional questions regarding this matter to the undersigned.

Sincerely,

/s/ Adam D. Krinsky
Adam D. Krinsky
Counsel to Higher Ground LLC

cc: Stephen Buenzow (FCC WTB)
Nnake Nweke (FCC OET)
Paul Blais (FCC IB)