

WorldVu Development LLC
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McLean, VA 22102

December 3, 2019

Exhibit A: Narrative Statement

By this application, WorldVu Satellites Limited (“OneWeb”) seeks authority to operate twenty-two technically identical CPI 3.5 meter antennas in South Point, HI (the “South Point Earth Station”). The South Point Earth Station will provide gateway connectivity to OneWeb’s low earth orbit (“LEO”), non-geostationary (“NGSO”), fixed-satellite service (“FSS”) system, which was granted U.S. market access in June 2017.¹ OneWeb’s first six production satellites were successfully launched on February 27, 2019.²

The South Point Earth Station will allow OneWeb to expand its coverage and service in the United States. Additional gateway facilities are a critical part of OneWeb’s network infrastructure as it prepares to begin commercial service.³ Grant of this application will serve the public interest by facilitating OneWeb’s ability to deliver ubiquitous, state-of-the-art broadband access to previously unserved and underserved populations in the United States.

I. Communications with Non-U.S.-Licensed Space Stations

OneWeb hereby incorporates by reference the *OneWeb U.S. Market Access Grant* to demonstrate compliance with the requirements of Section 25.137 of the Commission’s rules for earth station applicants proposing to communicate with non-U.S.-licensed space stations.⁴

II. Spectrum Use and Sharing

The South Point Earth Station will be mounted on fixed platforms. Although the angle at which the antennas point will change with the tracking of OneWeb’s in-orbit satellites, each platform will remain stationary. The South Point Earth Station will communicate with OneWeb’s system in the following frequency bands:

- 17.8-18.6 GHz (downlink)
- 18.8-19.3 GHz (downlink)
- 27.5-29.1 GHz (uplink)
- 29.5-30.0 GHz (uplink)

¹ See *WorldVu Satellites Limited, Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb NGSO FSS System*, Order and Declaratory Ruling, 32 FCC Rcd 5366 (2017) (“*OneWeb U.S. Market Access Grant*”) (granting OneWeb market access for its LEO NGSO FSS satellite constellation).

² See Caleb Henry, *OneWeb’s first six satellites in orbit following Soyuz launch*, SPACENEWS (Feb. 27, 2019), <https://spacenews.com/first-six-oneweb-satellites-launch-on-soyuz-rocket/>.

³ OneWeb has been granted two gateway earth station licenses in the United States. See *Satellite Communications Services, Actions Taken*, Public Notice, Report No. SES-02217 at 3-4 (rel. Nov. 13, 2019). OneWeb has also filed two other gateway earth stations applications in the United States. See IBFS File Nos. SES-LIC-20180727-02076, Call Sign E181294 (filed July 27, 2018); SES-LIC-20190422-00538, Call Sign E190236 (filed April 22, 2019).

⁴ See 47 C.F.R. § 25.137.

As illustrated below, OneWeb’s South Point Earth Station will operate in a manner consistent with the Commission’s rules.

A. Uplink

1. 27.5-29.1 GHz

27.5-28.35 GHz. The Upper Microwave Flexible Use Service (“UMFUS”) has a primary designation in the 27.5-28.35 GHz band in the Commission’s *Ka-band Plan*, with a secondary designation for FSS.⁵ FSS earth stations are permitted in the 27.5-28.35 GHz band and are not required to provide interference protection to future UMFUS operators if certain conditions are met.⁶ The Commission also clarified in the *NGSO Order* that “NGSO FSS systems must operate on an unprotected, non-interference basis with respect to GSO FSS networks” in the 27.5-28.35 GHz band.⁷

28.35-28.6 GHz. FSS is primary in the 28.35-28.6 GHz band, and the *Ka-band Plan* designated NGSO FSS as secondary to GSO FSS in this band.⁸

28.6-29.1 GHz. In the U.S. Table of Frequency Allocations and under the Commission’s *Ka-band Plan*, NGSO FSS has a primary designation in the 28.6-29.1 GHz band.⁹

Terrestrial Coordination. Section 25.136(a)(4) of the Commission’s rules allows earth station licensees in the 27.5-28.35 GHz band to operate in accordance with the terms of their authorization without providing additional interference protection to UMFUS stations when four

⁵ *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 7809 (2017) (“*NGSO Order*”); *NGSO Order*, 32 Rcd at 7850, App. B (“*Ka-band Plan*”); see also 47 C.F.R. § 25.136(a) (“FSS is secondary to the Upper Microwave Flexible Use Service in the 27.5-28.35 GHz band.”).

⁶ See 47 C.F.R. § 25.136(a); see also *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 8014, 8036 ¶ 54 (2016).

⁷ *NGSO Order*, 32 FCC Rcd at 7817, ¶ 23.

⁸ See *Ka-band Plan*.

⁹ 47 C.F.R. § 2.106, NG165; see also *Ka-band Plan*. Additionally, in the *OneWeb U.S. Market Access Grant*, the Commission authorized OneWeb’s uplink operations in this band. *OneWeb U.S. Market Access Grant*, 32 FCC Rcd at 5366, ¶ 1.

conditions are met.¹⁰ Appendix A to this Narrative Statement demonstrates the South Point Earth Station will satisfy all four conditions.

The Comsearch Coordination Report attached separately as Exhibit B¹¹ to this application demonstrates that in the 27.5-28.35 GHz band: (1) OneWeb can operate the South Point Earth Station without causing harmful interference to existing terrestrial deployments, and (2) OneWeb coordinated with existing licensees in compliance with the Commission's rules.

GSO Coordination. OneWeb makes no claim of interference protection from U.S.-licensed GSO FSS systems in the 27.5-28.6 GHz band. The ITU developed uplink equivalent power flux density ("EPFD_{up}") limits to protect co-frequency GSO FSS operations from unacceptable interference from NGSO FSS systems operating in the same frequencies. Specifically, in accordance with Article 22 of the ITU Radio Regulations, if the applicable EPFD_{up} limits are met, then the Commission will consider the NGSO FSS satellite system to have met its obligations of protecting GSO FSS networks from unacceptable interference.¹² OneWeb has demonstrated that it meets the applicable ITU EPFD_{up} limits in all frequency ranges where these limits apply and certifies its operations will be compliant with Article 22 and Resolution 76 of the ITU's rules.¹³ Consequently, the transmissions from the South Point Earth Station will sufficiently protect GSO FSS systems.

¹⁰ See 47 C.F.R. § 25.136(a)(4); see also *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, Second Report and Order, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, and Memorandum Opinion and Order, 32 FCC Rcd 10988, 11080, Appendix A (2017) ("*Second Spectrum Frontiers Order*") (adopting changes to this rule section).

¹¹ The emission designators provided in the Comsearch Reports in Exhibit B reflect the carrier noise bandwidth (3 dB bandwidth), which is smaller than the necessary bandwidth (typically 15 dB bandwidth), that has been used for this earth station application and for the *OneWeb U.S. Market Access Grant*. The difference in bandwidth is less than ten percent. Therefore, this variance has no impact on the data culling function performed by Comsearch and provides a more accurate portrayal of the interference potential of OneWeb's earth station emissions since the power-spectral density and the receiver noise bandwidth are computed based on the actual noise bandwidth instead of the necessary or occupied bandwidth.

¹² See *NGSO Order*, 32 FCC Rcd at 7820, ¶ 32 ("Any NGSO FSS system operating in compliance with these limits is considered as having fulfilled its obligation under Article 22 of the ITU Radio Regulations not to cause unacceptable interference to any GSO network.").

¹³ See *WorldVu Satellites Limited, Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb NGSO FSS System*, IBFS File No. SAT-LOI-20160428-00041, Technical Narrative ("*Market Access Application Technical Narrative*") at 33-34; A2-9 – A2-12.

2. 29.5-30.0 GHz

The 29.5-30.0 GHz band is allocated to the FSS on a co-primary basis with the Mobile Satellite Service (“MSS”), with NGSO FSS having a secondary designation to GSO FSS in the *Ka-band Plan*.¹⁴

OneWeb makes no claim of interference protection from U.S.-licensed GSO FSS systems in this band,¹⁵ and the transmissions from the South Point Earth Station will sufficiently protect GSO FSS systems because the OneWeb system meets the applicable ITU EPFD_{up} limits in all frequency ranges where these limits apply.¹⁶

B. Downlink

Federal Coordination. Space-to-Earth operations in the bands between 17.7-20.2 GHz must complete coordination with U.S. Federal systems in accordance with footnote US334 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, prior to being used. Footnote US334 lists several locations where federal space and earth station operations are primary. However, the South Point Earth Station is located outside the areas of concern in US334. Therefore, US334 is not applicable to the instant application.

1. 17.8-18.3 GHz

In the *NGSO Order*, the Commission allocated the 17.8-18.3 GHz band on a primary basis to the terrestrial fixed service (“FS”) and on a secondary basis for FSS, subject to international power flux-density (“PFD”) limits.¹⁷ OneWeb previously demonstrated that secondary use of this band for its downlink operations will not cause harmful interference to FS operations because OneWeb’s system meets the ITU PFD limits.¹⁸ Consequently, the Commission authorized OneWeb’s space stations to transmit in this band despite being on a non-conforming basis at the time.¹⁹ Moreover, the Comsearch Interference Analysis Report attached

¹⁴ 47 C.F.R. § 2.106; *see also Ka-Band Plan*.

¹⁵ *See OneWeb U.S. Market Access Grant*, 32 FCC Rcd at 5377, ¶ 23(j). Similarly, OneWeb will operate in this band without seeking protection or causing harmful interference to any co-frequency MSS operations.

¹⁶ *Market Access Application Technical Narrative* at 33-34; A2-1 – A2-6. OneWeb believes that the EPFD_{up} limits associated with the protection of GSO FSS networks would also adequately protect any GSO MSS network.

¹⁷ *NGSO Order*, 32 FCC Rcd at 7812, ¶¶ 7-8.

¹⁸ *See Market Access Application Technical Narrative* at 23-26; *see also id.*

¹⁹ *See OneWeb U.S. Market Access Grant*, 32 FCC Rcd at 5373, ¶¶ 16, 23. At the time of this grant, the Commission had not adopted a secondary allocation for FSS.

as Exhibit B²⁰ to this application indicates that there will be no restrictions on OneWeb’s operations due to interference considerations in this band.

2. 18.3-18.6 GHz

The 18.3-18.6 GHz band is allocated on a primary basis to the FSS, as the *NGSO Order* amended the *Ka-band Plan* to “allow NGSO FSS systems to operate on an unprotected, non-interference basis with respect to GSO FSS networks in the 18.3-18.6 GHz . . . band[], subject to international equivalent power flux-density (“EPFD”) limits.”²¹ The ITU developed downlink EPFD (“EPFD_{down}”) limits to protect GSO FSS networks from unacceptable interference from NGSO FSS systems operating in the same frequencies. Like the EPFD_{up} limits, if the NGSO FSS system meets the applicable EPFD_{down} limits, then the Commission will consider the NGSO FSS satellite system to have met its obligations to protect GSO FSS networks from unacceptable interference. OneWeb provided calculations for transmissions in this band showing that the OneWeb system meets the applicable ITU EPFD_{down} limits in all frequency ranges where these limits apply.²² The Commission authorized OneWeb’s NGSO FSS system to transmit in this band.²³

3. 18.8-19.3 GHz

The 18.8-19.3 GHz band is allocated to the FSS on a primary basis, and the Commission recently preserved the primary designation for NGSO FSS systems in the *Ka-band Plan*.²⁴ The Commission authorized OneWeb’s NGSO FSS system to transmit in this band.²⁵

²⁰ See *supra* note 11.

²¹ *NGSO Order*, 32 FCC Rcd at 7813, ¶¶ 9-10 (citing Section III.D.1).

²² See *Market Access Application Technical Narrative* at 33-34; A2-1 – A2-8.

²³ *OneWeb U.S. Market Access Grant*, 32 FCC Rcd at 5366, ¶¶ 16, 23.

²⁴ *NGSO Order*, 32 FCC Rcd at 7814, ¶ 14.

²⁵ *OneWeb U.S. Market Access Grant*, 32 FCC Rcd at 5366, ¶ 1.

III. Antenna Patterns

Appendix B certifies the South Point Earth Station antenna patterns are in compliance with the relevant sections of Sections 25.132 and 25.209 of the Commission's rules.

IV. Radiation Hazard Report

Appendix C provides the radiation hazard analysis for the South Point Earth Station.

V. FAA Notification

FAA notification is not required as the South Point Earth Station will not exceed 6.1 meters above ground.

VI. Conclusion

As explained above, grant of OneWeb's South Point Earth Station application is in the public interest and meets the requirements of the Commission's rules.

Respectfully submitted,

/s/ Eric Graham

Eric Graham

Regulatory Affairs, North America

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APPENDIX A: 47 CFR § 25.136(a)(4) – UMFUS COMPLIANCE

The Commission’s rules define four elements that, if met, permit an earth station licensee to operate in accordance with the terms of its authorization without providing additional interference protection to UMFUS stations in the 27.5-28.35 GHz band.²⁶ Based on the following analysis, the Commission should authorize the OneWeb South Point Earth Station without requiring additional protection for future UMFUS licensees in Hawaii County, Hawaii.

1. § 25.136(a)(4)(i)

The South Point Earth Station complies with this section of the Commission’s rules because there is only one other earth station in the 27.5-28.35 GHz band in Hawaii County, Hawaii.²⁷

2. § 25.136(a)(4)(ii)

Section 25.135(a)(4)(ii) provides that, in a UMFUS license area with a population between 6,000 and 450,000 people, no more than 450 people may be within an earth station’s PFD contour that is equal to or exceeds $-77.6 \text{ dBm/m}^2/\text{MHz}$ to avoid having to provide interference protection to future UMFUS operators. The area around the South Point Earth Station falling within this PFD contour is fully contained within Hawaii County which has a population of just under 201,000 people.²⁸ As demonstrated below, the South Point Earth Station’s PFD contour contains far fewer than 450 people.

Using the ITU RR Appendix 7 Time-Variant Gain (TVG) method, each of the 22 antennas of the South Point Earth Station would track a different OneWeb satellite above a minimum elevation angle of 5 degrees.²⁹ A composite (22 antennas) PFD contour was developed via proprietary software and compared with the Visualyse PRO software to ensure consistency. This composite assessed the cumulative distribution function (CDF or joint probability) of potential interference representing the EIRP towards the horizon and the propagation statistics by performing the convolution of the individual CDFs. As a result, the TVG method calculates the area where the PFD limit could be exceeded, assuming a PFD value

²⁶ See 47 C.F.R. § 25.136(a)(4).

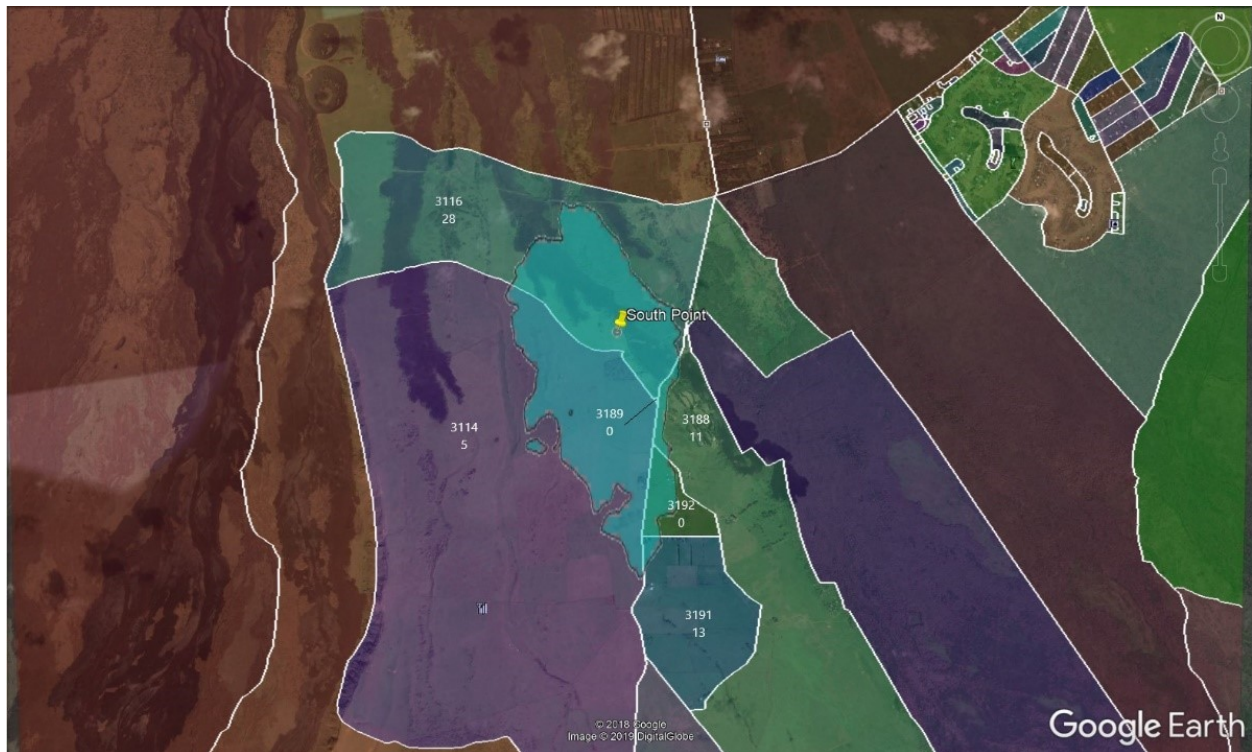
²⁷ See IBFS File Nos. SES-LIC-20180122-00053, Call Sign E180005 (granted Mar. 8, 2018) (“O3b Earth Station”).

²⁸ See QuickFacts Hawaii County, Hawaii, United States Census Bureau (last viewed Nov. 5, 2019), <https://www.census.gov/quickfacts/fact/table/hawaiicountyhawaii/PST045218>.

²⁹ In this analysis, the population data for each census block within the South Point Earth Station PFD contour comes from the 2010 U.S. Census data. The propagation model implements a 1-arc second resolution SRTM Digital Terrain Elevation Data (DTED) profile based on the ITU-R Recommendation P.452-15.

that is not exceeded for 99% of the time. The following contains the South Point Earth Station parameters³⁰ and the resulting PFD contour of the analysis:³¹

South Point Earth Station Parameters	
ES latitude (NAD 83)	19° 1' 28.2" N
ES longitude (NAD 83)	155° 40' 1.6" W
Ground Elevation (AMSL)	358.14 m
ES antenna size	3.5 m
ES input power spectral density	-19.0 dBW/MHz
ES minimum elevation angle	5°
Number of antennas at site	22



³⁰ It should be noted that the earth station input power spectral density is 3.4 dB lower than the maximum provided in the Application since the latter includes maximum uplink power control for rain events exceeding 6 dB. The clear sky value is the most appropriate calculation for this analysis because uplink power control is not used for fade levels less than 6 dB.

³¹ The South Point Earth Station’s PFD contour is displayed using Google Maps and then superimposed on a U.S. Census map to estimate the population within the contour—note that the population counts for each census block are below the four-digit block IDs.

The next table displays the calculated population for each census block within the South Point Earth Station PFD contour:

Block ID	Population	Proportion Covered (estimated)	Assumed Population of Contour Coverage		
			Only Completely Covered Blocks	Include Partially Covered Blocks	100% of Pop. in all Blocks
3114	5	25%	0	2	5
3116	28	35%	0	10	28
3188	11	5%	0	1	11
3189	0	100%	0	0	0
3191	13	10%	0	2	13
3192	0	50%	0	0	0
Total Population			0	15	57

The summation of the population in the South Point Earth Station PFD contour is approximately:

- 0 people (accounting for only the populations of those census blocks that are wholly contained within the contour and assuming the populations of the partially covered blocks fall outside the PFD contour);
- 15 people (accounting for a very conservative proportion of the population of all the census blocks wholly and partially contained within the PFD contour, where in the blocks with partial contour coverage, a very conservative proportion of the blocks is calculated based on the estimated geographical area of the block within the PFD contour over its total area); or
- 57 people (accounting for the total population of all blocks touched by the PFD contour).

The third column in the above table would likely never occur because the interference contour only covers a portion of the land area of all the blocks. Regardless, even assuming this population, 57 people is far less than the 450-person limit.

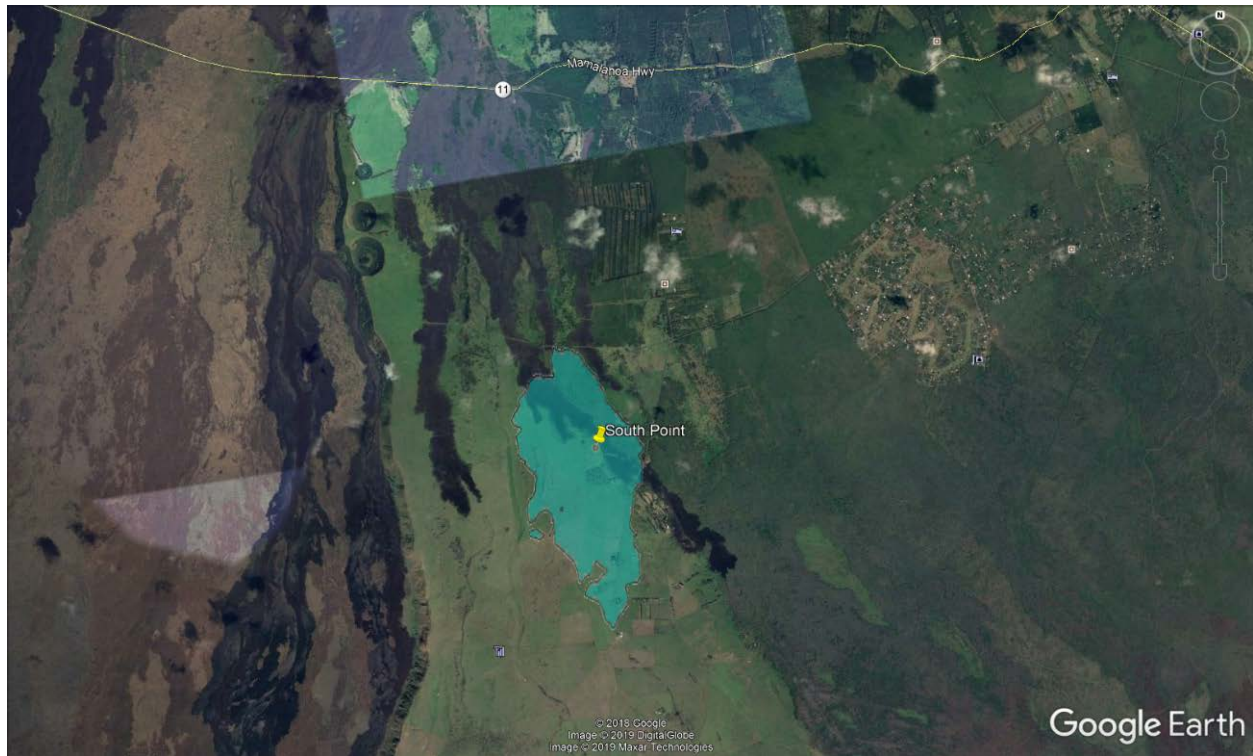
Regarding the other earth station located in Hawaii County, the O3b Earth Station covers a population of 239 people according to its FCC application.³² Therefore, even in a most conservative estimate, only 296 people could be counted as within the contour of an earth station in the UMFUS license area, and so the 450-person limit is not exceeded.

3. § 25.136(a)(4)(iii)

Based on a search in Google Maps, there are no major event venues, urban mass transit routes, passenger railroads or cruise ship ports within the South Point Earth Station’s PFD contour. Additionally, the PFD contour does not overlap with any Interstates, Other Freeways and Expressways, or Other Principal Arterials as defined by The Federal Highway

³² See O3b Earth Station.

Administration Office of Planning, Environment, and Realty Executive Geographic Information System map.³³



Therefore, and as illustrated in the image above, the South Point Earth Station complies with the requirements of this subsection.

4. § 25.136(a)(4)(iv)

The Comsearch Coordination Report in Exhibit B³⁴ demonstrates that OneWeb completed coordination in compliance with the Commission's rules.

³³ See National Highway System Map, U.S. Department of Transportation, Federal Highway Administration (last visited Mar. 27, 2019), <https://hepgis.fhwa.dot.gov/fhwagis/>.

³⁴ See *supra* note 11.

Appendix B: 47 CFR § 25.132 – Antenna Patterns Certification

I, Marc Dupuis, Senior Director of Spectrum Affairs for OneWeb, hereby certify that I

- reviewed the results of a series of radiation pattern tests for the CPI 3.5 meter antenna performed by the antenna manufacturer on representative equipment in representative configurations, and
- found the test results demonstrate that the CPI 3.5 meter antenna meets relevant off-axis gain standards in Section 25.209 of the Commission’s rules, measured in accordance with Section 25.132(b)(1).

This certification is dated December 3, 2019 and signed by:

/s/ Marc Dupuis

Marc Dupuis
Senior Director, Spectrum Affairs
WorldVu Satellites Limited
1785 Greensboro Station Place
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McLean, VA 22102

APPENDIX C: RADIATION HAZARD REPORT

In accordance with OET Bulletin 65, this Radiation Hazard Report measured radiation exposure levels in seven zones for two cases—general population and occupational. The radiation levels calculated for each zone in Section II are derived from the calculations made in Section I. The results in Section III for OneWeb’s 3.5 meter CPI antenna illustrate any radiation hazard that may exist for the general public and/or occupationally will be mitigated by limited access and various protocols to ensure safe exposure levels.

I. Defined Variables for OET Bulletin 65 Calculated Variables

Variables	Value	Unit	OET 65 Calculated Variables	Formula	Value	Unit
$D =$ <i>Aperture Diameter</i>	3.5	Meters	$\lambda =$ Wavelength	c/F	0.0104	Meters
$d =$ <i>Subreflector Diameter</i>	0.406	Meters	$P_1 =$ Total Antenna Input Power	$P * p$	114	Watts
$\eta =$ <i>Aperture Efficiency</i>	57%	Percentage	$A =$ Area of reflector	$\pi(D/2)^2$	9.62113	Meters ²
<i>FCC Designation</i>	Ka	Band	$a =$ area of sub-reflector	$\pi(d/2)^2$	0.12946	Meters ²
$F =$ <i>Frequency</i>	28750	MHz	$G =$ Antenna Gain	$G = 4\pi\eta A/\lambda^2$	630965.68	Linear
$P =$ <i>Transmitter Power Watts</i>	114.1	Watts	Antenna Gain dB	$10\log_{10}(G)$	58.00	dBi
$p =$ <i>Number of Transmitters</i>	1	#	$R_{nf} =$ Near-Field Region	$R_{nf} = D^2/4\lambda$	293.69	Meters
$R_{ua} =$ <i>Closest Point to Uncontrolled Area</i>	25	Meters	Transition Region	$>R_{nf} < R_{ff}$	293.69	>Meters
$R_{ua} =$ <i>Elevation angle at closest point</i>	5	Degrees			704.86	<Meters
			$R_{ff} =$ Far-Field Region	$R_{ff} = 0.6D^2/\lambda$	704.86	Meters
					61.67	Meters AGL

II. Radiation Levels in Each Zone

Radiation Analysis Zone		Formula	Level	Value	Exposure Limits Met	
					General Public	Occupational
					<1mW/cm ²	<5mW/cm ²
1	Power Sub-reflector	$4P_I/a$	352.48	mW/cm ²	No	No
2	Antenna Surface	$4P_I/A$	4.74	mW/cm ²	No	Yes
3	Main Reflector Ground	P_I/A	1.19	mW/cm ²	No	Yes
4	$S_{nf} =$ Near-Field Power Density	$4\eta(P_I/A)$	2.69	mW/cm ²	No	Yes
5	Transition Max Power Density	$S_{nf} * R_{nf}/R_{nf}$	2.69	mW/cm ²	No	Yes
6	Far-Field Max Power Density	$P_I * G/4\pi R^2$	1.15	mW/cm ²	No	Yes
7	Off-axis Near Field	$S_{nf}-20dB$	0.03	mW/cm ²	Yes	Yes

III. Results

General Public Analysis. OneWeb's 3.5 meter CPI antennas will be located in an area clearly marked with Radiation Hazard signage with no access by the general public. Zones 1 through 5 create no concern for the general public as they lie behind this signage where only authorized personnel may enter. Likewise, Zone 6—Far Field—also creates no concern for the general public because it develops 61.67 meters above ground level at a minimum elevation angle of five degrees where the general public cannot access. Accordingly, there is no risk of radiation exposure beyond the acceptable limits.

Occupational Analysis. Only around the Power Sub-reflector are any radiation levels exceeded. This measurement is taken at a point between the feed and the sub-reflector. Power to the transmitters will be turned off remotely whenever work needs to be performed in this Zone. Signage will mark the area for Radiation Hazard and access by qualified personnel only, facilitating awareness and safety. Consequently, there is no risk of radiation exposure beyond the acceptable limits.