

**I. NON-U.S. SPACE STATION LICENSEE REQUIREMENTS**

§ 25.137 (a) of the Commission’s rules require Canadian-licensed systems to demonstrate that U.S.-licensed satellite systems have effective competitive opportunities to provide analogous service in Canada, and any other country in which communications with U.S. earth stations will originate or terminate. In accordance with § 25.137 (b), Kepler hereby incorporates its grant for market access to fulfill this condition.<sup>1</sup> Further, Kepler has complied with all applicable Commission space station requirements up to the filing of this application, including those pertaining to milestones, reporting requirements, surety bond requirements, and all other service rules associated with its Market Access Grant.<sup>2</sup>

Respectfully submitted,

*/s/ Nickolas G. Spina*

**Nickolas G. Spina**

Director of Regulatory Affairs

Kepler Communications Inc.

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<sup>1</sup> See Kepler Communications Inc., Petition for Declaratory Ruling to Grant Access to the U.S. Market for Kepler’s NGSO FSS System, Order and Declaratory Ruling, FCC 18-162 (Nov. 19, 2018) (“Market Access Grant”).

<sup>2</sup> In accordance with 47 C.F.R. § 25.137 (d).