

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Kuiper Systems LLC

Application for Gateway Earth Station
Authorization

Call Sign _____

File No. SES-LIC_____

APPLICATION FOR GATEWAY EARTH STATION AUTHORIZATION

Kuiper Systems LLC (“Kuiper”), a wholly owned subsidiary of Amazon.com Services LLC (collectively “Amazon”), seeks authority to operate a fixed gateway earth station (“gateway”) in Iola, Texas. This narrative demonstrates why authorizing this gateway would serve the public interest and explains how Amazon will operate pursuant to the Commission’s rules.

I. INTRODUCTION AND BACKGROUND

On July 30, 2020, the Commission authorized Amazon to deploy a 3,236 satellite non-geostationary satellite orbit (“NGSO”) system to provide service using certain Fixed-Satellite Service (“FSS”) and Mobile-Satellite Service (“MSS”) Ka-band frequencies (the “Kuiper System”).¹ As the basis for that authorization, the Commission determined that Amazon’s system would expand the availability of high-speed broadband, thus serving the public interest.² Since then, Amazon has taken significant steps to support deployment of the Kuiper System and advance

¹ See *Kuiper Systems LLC, Application for Authority to Deploy and Operate a Ka-band Non-Geostationary Satellite Orbit System*, Order and Authorization, 35 FCC Rcd 8324-25 ¶¶ 3-4 (2020) (“2020 Kuiper System Authorization”).

² See *2020 Kuiper System Authorization*, 35 FCC Rcd at 8326 ¶ 9.

its goal of providing affordable, reliable, high-quality connectivity to customers and communities around the world—including growing the team dedicated to the Kuiper System to more than 1,000 employees, and purchasing launch capacity from a diverse set of providers to carry into space the majority of the 3,236 satellites that make up the currently authorized Kuiper constellation.³ Amazon has also taken steps to comply with the conditions of its authorization, including by obtaining the Commission’s approval of its updated orbital debris mitigation plan upon finalizing its space station design.⁴

With this application, Amazon seeks authority to operate the proposed gateway in Iola, Texas. The gateway will consist of six (6) technically identical 2.4-meter antennas that will communicate with Amazon’s NGSO FSS and MSS Kuiper System (call sign S3051) in the frequency bands 27.5-30.0 GHz (Earth-to-space) and 17.8-18.6 GHz and 18.8-20.2 GHz (space-to-Earth). No more than four (4) antennas will transmit on the same channel at any one time.

II. PUBLIC INTEREST BENEFITS

When the Commission originally authorized the Kuiper System, it “conclude[d] that grant of Kuiper’s application would advance the public interest” because the Kuiper System was “designed to increase the availability of high-speed broadband service to consumers, government,

³ See *Amazon Makes Historic Launch Investment to Advance Project Kuiper*, Amazon (Apr. 5, 2022), <https://bit.ly/3uvlwBT>. Amazon recently filed an application for modification of its Ka-band authorization to adjust orbital characteristics and reduce the size of the constellation to 3,232. See Kuiper Systems LLC, *Request for Modification of the Authorization for the Kuiper NGSO Satellite System*, SAT-MOD-20230228-00043 (Feb. 28, 2023).

⁴ See *Kuiper Systems LLC, Request for Modification of the Authorization for the Kuiper NGSO Satellite System, Order and Authorization*, SAT-MOD-20211207-00186 (Feb. 8, 2023) (“2023 Kuiper System Authorization”) (together with the *2020 Kuiper System Authorization*, the “*Kuiper System Authorization*”). See also *2020 Kuiper System Authorization*, 35 FCC Rcd at 8345 ¶ 64.

and businesses.”⁵ The same public interest considerations that supported grant of the original space station application support granting this gateway application now.

Grant of this application will allow Amazon’s Kuiper System to execute its plans to deliver satellite broadband communications services to tens of millions of unserved and underserved consumers and businesses in the United States and around the globe.⁶ Indeed, grant of this gateway application will accelerate Kuiper’s ability to bring connectivity to consumers and enterprise customers, enabling growth in local economies, improving access to government services, and supporting public safety and disaster relief communications.

III. SPECTRUM USE AND SHARING

Amazon will adhere to all International Telecommunication Union (“ITU”) and Commission requirements, and pertinent future Commission rulemakings governing NGSO Ka-band gateways. When sharing spectrum, Amazon will operate pursuant to the *Kuiper System Authorization*⁷ and the Commission’s rules, as discussed below.

A. Kuiper System Gateway Transmit Frequencies

The gateway will transmit to Kuiper System satellites in the frequencies listed in Table 1 and follow relevant sharing requirements in the Commission’s rules.

⁵ 2020 *Kuiper System Authorization*, 35 FCC Rcd at 8324 ¶ 3.

⁶ See, e.g., *In re Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, Fourteenth Broadband Deployment Report, 36 FCC Rcd 836, 837 ¶ 2 (2021) (noting that 14.5 million Americans lack access to fixed terrestrial broadband with benchmark download and upload speeds of 25 Mbps and 3 Mbps, respectively).

⁷ See 2023 *Kuiper System Authorization* at ¶¶ 31-43; 2020 *Kuiper System Authorization*, 35 FCC Rcd at 8344-45 ¶ 59.

Table 1: Kuiper System Gateway Transmit Frequencies

Transmit Frequencies (GHz)	Status⁸
27.5-28.35	FSS secondary to UMFUS ⁹ NGSO FSS secondary to GSO FSS
28.35-28.6	NGSO FSS secondary to GSO FSS
28.6-29.1	NGSO FSS primary
29.1-29.5	NGSO MSS feeder link co- primary
29.5-30.0	NGSO FSS secondary to GSO FSS

1. 27.5-28.35 GHz (NGSO FSS secondary to UMFUS and GSO FSS)

NGSO FSS may transmit on a secondary basis without providing interference protection to the Upper Microwave Flexible Use Service (“UMFUS”) in the 27.5-28.35 GHz band.¹⁰ Exhibit A, the UMFUS analysis, demonstrates how the gateway satisfies the section 25.136(a) protection criteria and, therefore, does not need to protect future UMFUS deployments.¹¹ Exhibit C, the

⁸ See generally 47 C.F.R. § 2.106; *In re 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 FSS Order”); *id.* at 7850-51 Appendix B (“Ka-band Plan”).

⁹ EPFD compliance permits NGSO and GSO FSS sharing. See *NGSO FSS Order*, 32 FCC Rcd at 7817, 7821-22 ¶¶ 23, 37, 39; 47 C.F.R. § 25.289.

¹⁰ See 47 C.F.R. §§ 2.106, 25.136; *International Bureau Issues Guidance on Siting Methodologies for Earth Stations Seeking to Operate in the 24.75-25.25 GHz, 27.5-28.35 GHz, 37.5-40 GHz, 47.2-48.2 GHz, and 50.4-51.4 GHz Frequency Bands to Demonstrate Compliance with Section 25.136*, Public Notice, 35 FCC Rcd 6347 (IB 2020).

¹¹ See 47 C.F.R. § 25.136(a); Exhibit A.

Comsearch Report, establishes that Amazon has coordinated with UMFUS licensees consistent with section 101.103(d).¹²

NGSO FSS must also operate on an unprotected, non-interference basis with respect to GSO FSS networks in this band.¹³ Amazon does not claim interference protection from GSO FSS in this band. In addition, Amazon certifies that it will comply with the applicable EPFD limits in ITU Radio Regulations Article 22 and Resolution 76,¹⁴ which the Commission has found to be sufficient to protect GSO systems against harmful interference,¹⁵ and will otherwise comply with the terms of the Kuiper Authorization.¹⁶

2. 28.35-28.6 GHz and 29.5-30.0 GHz (NGSO FSS secondary to GSO FSS systems)

NGSO FSS may transmit on a secondary basis to geostationary orbit (“GSO”) FSS in the 28.35-28.6 GHz and 29.5-30.0 GHz bands.¹⁷ Amazon does not claim interference protection from GSO FSS in these bands and certifies it will comply with the applicable EPFD limits in ITU Radio Regulations Article 22 and Resolution 76 to ensure transmissions do not cause harmful interference.¹⁸

¹² See 47 C.F.R. § 101.103(d); Exhibit C.

¹³ See *NGSO FSS Order*, 32 FCC Rcd at 7817 ¶ 23.

¹⁴ See 47 C.F.R. §§ 25.108, 25.115(f)(1), 25.146(a)(2); ITU Radio Regulations Article 22 and Resolution 76 (WRC-15) (incorporated by reference at 47 C.F.R. § 25.108).

¹⁵ See, e.g., *2000 NGSO FSS Order*, 16 FCC Rcd 4096, 4129-30, ¶ 77 (concluding that implementation of EPFD limits “will adequately protect GSO FSS networks”); 47 C.F.R. § 25.289 (NGSO satellite systems that comply with EPFD limits will be deemed not to cause unacceptable interference to any GSO network).

¹⁶ See *2020 Kuiper System Authorization*, 35 FCC Rcd at 8328 ¶ 16.

¹⁷ See 47 C.F.R. § 2.106; Ka-band Plan.

¹⁸ See 47 C.F.R. §§ 2.106, 25.108(a), (c), 25.115(f)(1), 25.146(a)(2); Ka-band Plan; ITU Radio Regulations Article 22 and Resolution 76 (WRC-15) (incorporated by reference at 47 C.F.R. § 25.108). See also *In re Amendment of Parts 2 and 25 of the Commission’s Rules to Permit Operation of NGSO FSS Systems Co-Frequency with GSO and Terrestrial Systems in the Ku-Band*

3. 28.6-29.1 GHz (NGSO FSS primary)

NGSO FSS may transmit on a primary basis in the 28.6-29.1 GHz band.¹⁹ Amazon's operations as NGSO FSS possess primary status in the band.²⁰

4. 29.1-29.5 GHz (NGSO MSS feeder link co-primary)

NGSO MSS feeder links may transmit on a co-primary basis with the Local Multipoint Distribution Service ("LMDS") in the 29.1-29.25 GHz band and GSO FSS in the 29.25-29.5 GHz band.²¹ As described in the following sub-sections, the Commission has granted Amazon authority to operate NGSO MSS feeder links in this band and, therefore, the gateway may operate on a primary basis.²²

a. NGSO MSS feeder link

To share with other co-primary NGSO MSS feeder link systems, Amazon will coordinate use of the band with NGSO system operators not included in the March 2020 processing round before commencing service²³ and employ the section 25.261 spectrum-sharing framework with NGSO system operators in the March 2020 processing round while operating service.²⁴

Frequency Range, First Report and Order and Further Notice of Proposed Rule Making, 16 FCC Rcd 4096, 4129-30 ¶ 77 (2000) ("*2000 NGSO FSS Order*") (concluding that compliance with EPFD limits "will adequately protect GSO FSS networks").

¹⁹ See 47 C.F.R. § 2.106; Ka-band Plan.

²⁰ See *2020 Kuiper System Authorization*, 35 FCC Rcd at 8327 ¶ 11; 47 C.F.R. § 25.261. In the 28.5-29.1 GHz band, Amazon will not cause harmful interference to, or claim protection from, grandfathered Fixed Service ("FS") stations as required by the Commission's rules. See 47 C.F.R. § 2.106 n. NG62.

²¹ See 47 C.F.R. § 2.106; Ka-band Plan.

²² See *2020 Kuiper System Authorization*, 35 FCC Rcd at 8325, 8330-31 ¶¶ 5 n.7, 24-25.

²³ Before using this band, Amazon will coordinate with NGSO MSS feeder link systems using the same frequencies and polarizations as Amazon. See *2023 Kuiper System Authorization* at ¶ 39; *2020 Kuiper System Authorization*, 35 FCC Rcd at 8345 ¶ 59(i).

²⁴ See *2023 Kuiper System Authorization* at ¶ 39; *2020 Kuiper System Authorization*, 35 FCC Rcd at 8345 ¶ 59(i); 47 C.F.R. § 25.261.

b. LMDS

To share with LMDS, Amazon will coordinate as required by the Commission's rules.²⁵

c. FS

To share with FS, Amazon will not cause harmful interference to, or claim protection from, grandfathered FS stations as required by the Commission's rules.²⁶

B. Kuiper System Gateway Receive Frequencies

The gateway will receive transmissions from the Kuiper System in the frequencies listed in Table 2 and follow relevant sharing requirements in the Commission's rules.²⁷

Table 2: Kuiper System Gateway Receive Frequencies

Frequencies (GHz)	Status²⁸
17.8-18.3	FSS secondary to FS ²⁹
18.3-18.6	NGSO FSS secondary to GSO FSS
18.8-19.3	NGSO FSS primary
19.3-19.4 and 19.6-19.7	NGSO FSS secondary to FS, NGSO MSS FL, and GSO FSS
19.4-19.6	NGSO MSS feeder link co-primary

²⁵ See 47 C.F.R. §§ 25.203, 101.103(d).

²⁶ See 47 C.F.R. § 2.106 n.NG62.

²⁷ Before operating in these bands, Amazon will complete coordination with U.S. Federal systems. See *id.* n.US334; 2023 Kuiper System Authorization at ¶ 43; 2020 Kuiper System Authorization, 35 FCC Rcd at 8345 ¶ 59(m).

²⁸ See generally 47 C.F.R. § 2.106. See also generally NGSO FSS Order; Ka-band Plan.

²⁹ EPFD compliance permits NGSO and GSO FSS sharing. See NGSO FSS Order, 32 FCC Rcd 7809, 7812, 7821-22 ¶¶ 7 n.19, 37, 39; 47 C.F.R. § 25.289.

19.7-20.2	NGSO FSS secondary to GSO FSS
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1. 17.8-18.3, 19.3-19.4, and 19.6-19.7 GHz (NGSO FSS secondary to FS)

NGSO FSS may receive on a secondary basis to FS in the 17.8-18.3, 19.3-19.4, and 19.6-19.7 GHz bands.³⁰ To share with FS, Amazon will meet the power flux-density limits in ITU Radio Regulations Article 21.³¹ Exhibit C, the Comsearch Report, confirms that no additional limitations are necessary.³²

2. 18.3-18.6 and 19.7-20.2 GHz (NGSO FSS secondary to GSO FSS)

NGSO FSS may receive on an unprotected, non-interference basis with respect to GSO FSS in the 18.3-18.6 GHz and 19.7-20.2 GHz bands.³³ To share with GSO FSS, Amazon will comply with the applicable EPFD limits in ITU Radio Regulations Article 22 and Resolution 76.³⁴

3. 18.8-19.3 GHz (NGSO FSS primary)

NGSO FSS may receive on a primary basis in the 18.8-19.3 GHz band.³⁵ Amazon's operations are licensed as NGSO FSS and, therefore, possess primary status in the band.³⁶

³⁰ See 47 C.F.R. § 2.106 n.NG166; Ka-band Plan.

³¹ See *2023 Kuiper System Authorization* at ¶¶ 34-35; *2020 Kuiper System Authorization*, 35 FCC Rcd at 8327, 8344 ¶¶ 13, 59(d)-(e).

³² See Exhibit C.

³³ See 47 C.F.R. § 2.106; Ka-band Plan.

³⁴ The Commission has found that EPFD demonstrations may permit NGSO FSS to share frequency bands with GSO FSS. See *2023 Kuiper System Authorization* at ¶¶ 34-35; *2020 Kuiper System Authorization*, 35 FCC Rcd at 8327-28, 8344 ¶¶ 13, 14, 59(d)-(e); 47 C.F.R. § 25.202(f); *NGSO FSS Order*, 32 FCC Rcd at 7821 ¶ 36 n.84. See also *2000 NGSO FSS Order*, 16 FCC Rcd 4096, 4129-30 ¶ 77.

³⁵ See 47 C.F.R. § 2.106; Ka-band Plan.

³⁶ See *2020 Kuiper System Authorization*, 35 FCC Rcd at 8327 ¶ 11.

4. 19.3-19.4 and 19.6-19.7 GHz (NGSO FSS secondary to GSO FSS)

NGSO FSS may receive on a secondary basis with respect to GSO FSS in the 19.3-19.4 GHz and 19.6-19.7 GHz bands.³⁷ To share with GSO FSS, Amazon will neither cause harmful interference to, nor claim protection from harmful interference from, GSO FSS.³⁸

5. 19.3-19.4 and 19.6-19.7 GHz (NGSO FSS secondary to NGSO MSS feeder link)

NGSO FSS may receive on a secondary basis to NGSO MSS feeder link systems in the 19.3-19.4 and 19.6-19.7 GHz bands.³⁹ To share with NGSO MSS feeder links, Amazon will coordinate use of the band with NGSO system operators not in the March 2020 processing round before commencing service⁴⁰ and employ the section 25.261 spectrum-sharing framework with NGSO system operators in the March 2020 processing round while operating service.⁴¹

6. 19.4-19.6 GHz (NGSO MSS feeder link co-primary)

NGSO MSS feeder links may receive on a co-primary basis with FS in the 19.4-19.6 GHz band.⁴² To share with co-primary MSS feeder link systems, Amazon will coordinate use of the band with operators not in the March 2020 processing round before commencing service and

³⁷ See 47 C.F.R. § 2.106; Ka-band Plan; *NGSO FSS Order*, 32 FCC Rcd at 7815-16 ¶ 19.

³⁸ See 47 C.F.R. § 2.105(c)(2).

³⁹ See 47 C.F.R. § 2.106; Ka-band Plan.

⁴⁰ Before using this band, Amazon will coordinate with NGSO MSS feeder link systems using the same frequencies and polarizations as Amazon. See *2023 Kuiper System Authorization* at ¶ 39; *2020 Kuiper System Authorization*, 35 FCC Rcd at 8345 ¶ 59(i); 47 C.F.R. § 25.261.

⁴¹ See *2023 Kuiper System Authorization* at ¶ 39; *2020 Kuiper System Authorization*, 35 FCC Rcd at 8345 ¶ 59(i); 47 C.F.R. § 25.261.

⁴² See 47 C.F.R. § 2.106; Ka-band Plan.

employ the section 25.261 spectrum-sharing framework with operators in the March 2020 processing round while operating service.⁴³

IV. ANTENNA PATTERN

There are no Commission standards for NGSO Ka-band gateway antenna pattern performance. The available standards consider only GSO Ku-/Ka-band or NGSO Ku-band operations because the Commission has “not yet determined what off-axis gain envelopes might be appropriate for [Ka-band gateways] operating with NGSO FSS space stations, either to facilitate NGSO-to-NGSO or NGSO-to-GSO interference protection.”⁴⁴ Amazon nonetheless will comply with the section 25.209(a)(1) mask for GSO Ka-band earth station antennas, as illustrated in Exhibit D’s simulated antenna pattern.⁴⁵

V. RADIATION HAZARD ANALYSIS

Exhibit B, the Radiation Hazard Analysis, confirms that Amazon complies with relevant Commission standards and demonstrates there is no risk of radiation exposure beyond the acceptable limits.⁴⁶ To further protect the general public, Amazon will site the gateway either behind a fence or on private commercial property with limited access. Trained technicians

⁴³ Before using this band, Amazon will coordinate with NGSO MSS feeder link systems using the same frequencies and polarizations as Amazon. *See 2023 Kuiper System Authorization* at ¶ 39; *2020 Kuiper System Authorization*, 35 FCC Rcd at 8345 ¶ 59(i); 47 C.F.R. § 25.261.

⁴⁴ *In re Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Second Report and Order, 30 FCC Rcd 14713, 14784 ¶ 213 (2015). *See also NGSO FSS Order*, 32 FCC Rcd at 7827 ¶¶ 54-55 & n.121 (declining to adopt NGSO gateway antenna performance standards). *See generally* 47 C.F.R. §§ 25.132, 25.209.

⁴⁵ *See* 47 C.F.R. § 25.209(a)(1); Exhibit D.

⁴⁶ *See* FCC OET Bulletin No. 65, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields* (Aug. 1997), <https://bit.ly/3SCjsBB>; 47 C.F.R. § 1.1310; Exhibit B.

responsible for operating the gateway will turn off and secure the transmitters before performing any maintenance work.

VI. FAA NOTIFICATION

For an antenna structure of 6.1 meters or less in height above ground level, the Commission requires no Federal Aviation Administration (“FAA”) notification.⁴⁷ Amazon’s antenna structure for the gateway measures 6.1 meters or less in height above ground level and requires no FAA notification.⁴⁸

VII. CONCLUSION

Amazon has satisfied the Commission’s licensing standards for NGSO Ka-band gateways. Prompt grant of this application will accelerate the deployment of the Kuiper System and its ability to expand broadband access for consumers, schools, hospitals, businesses, and other organizations across the United States.

Respectfully submitted,

/s/ Carrie Gage
Carrie Gage
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April 1, 2023

⁴⁷ See 47 C.F.R. § 17.2 (defining antenna structure as a structure that is constructed or used to transmit and/or receive radio energy or that supports antennas that transmit and/or receive radio energy and other appurtenances mounted thereon). See also *id.* §§ 17.7(e), 25.115(j).

⁴⁸ The maximum overall height of the antenna structure is 4 meters. Amazon provided this value in Form 312, Schedule B, field E35 (Above Ground Level (meters)) pursuant to the form’s instruction to provide “Maximum Antenna Height Above Ground Level (meters)” in this field. The height of the antenna structure from centerline is 2.74 meters. Amazon provided this value in Exhibit C (Comsearch Report).

EXHIBIT A (SECTION 25.136 UMFUS PROTECTION ANALYSIS)

This Exhibit A demonstrates that the proposed gateway earth station¹ satisfactorily protects 27.5-28.35 GHz Upper Microwave Flexible Use Service (“UMFUS”) deployments in Grimes County, TX (“County”).

Section 25.136(a)(4) of the Commission’s rules outlines how Fixed-Satellite Service (“FSS”) operators may deploy gateways in the 27.5-28.35 GHz band without providing additional interference protection to co-frequency UMFUS licensees.² *First*, one U.S. county may not possess more than three co-frequency FSS earth stations operating in the 27.5-28.35 GHz band.³ *Second*, the area in which the earth station generates a power flux-density (“PFD”) greater than or equal to -77.6 dBm/m²/MHz at 10 meters above ground level (“-77.6 dBm/m²/MHz”), together with the similar area of any other gateway authorized under section 25.136(a)(1)-(4), may not cover more than certain population amounts.⁴ *Third*, the -77.6 dBm/m²/MHz PFD contour may not contain any major event venue, urban mass transit route, passenger railroad, cruise ship port, or certain types of roads (Interstate, Other Freeways and Expressways, or Other Principal Arterial).⁵ *Fourth*, the FSS operator must have coordinated with existing UMFUS licensees located within a PFD contour greater than or equal to -77.6 dBm/m²/MHz at 10 meters above ground level pursuant to section 101.103(d) of the Commission’s rules.⁶

Amazon’s analysis shows compliance with section 25.136(a)(4) and the Guidance. No more than three FSS earth stations will operate under the provisions of section 25.136(a) in the County hosting the proposed gateway. Amazon’s -77.6 dBm/m²/MHz PFD contour covers 186 people of Grimes County’s total 29,268 people and 69 of Madison County’s 13,455. The PFD contour does not contain any major event venue, urban mass transit route, passenger railroad, cruise ship port, Interstate, Other Freeways and Expressways, or Other Principal Arterial. Amazon has also completed coordination with existing UMFUS licensees, as required.⁷ Accordingly, the

¹ In this document, earth stations are also referenced as gateways.

² See 47 C.F.R. § 25.136(a)(4). The Commission has offered additional guidance on how to present section 25.136 showings. See generally *International Bureau Issues Guidance on Siting Methodologies for Earth Stations Seeking to Operate in the 24.75-25.25 GHz, 27.5-28.35 GHz, 37.5-40 GHz, 47.2-48.2 GHz, and 50.4-51.4 GHz Frequency Bands to Demonstrate Compliance with Section 25.136*, Public Notice, 35 FCC Rcd 6347 (IB 2020) (“Guidance”).

³ See 47 C.F.R. § 25.136(a)(4)(i).

⁴ See 47 C.F.R. § 25.136(a)(4)(ii); *id.* at Table 2 to Paragraph (a)(4)(ii) (permitting the PFD contour to cover 0.1 percent of the population in a county with more than 450,000 people; 450 people in a county with 6,000-450,000 people; and 7.5 percent of the population in a county with fewer than 6,000 people).

⁵ See 47 C.F.R. § 25.136(a)(4)(iii). See also *In the Matter of 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, 11031-32, 11085-86 ¶ 131, Appendix B (2017).

⁶ See 47 C.F.R. § 25.136(a)(4)(iv).

⁷ See Exhibit C, Comsearch Report.

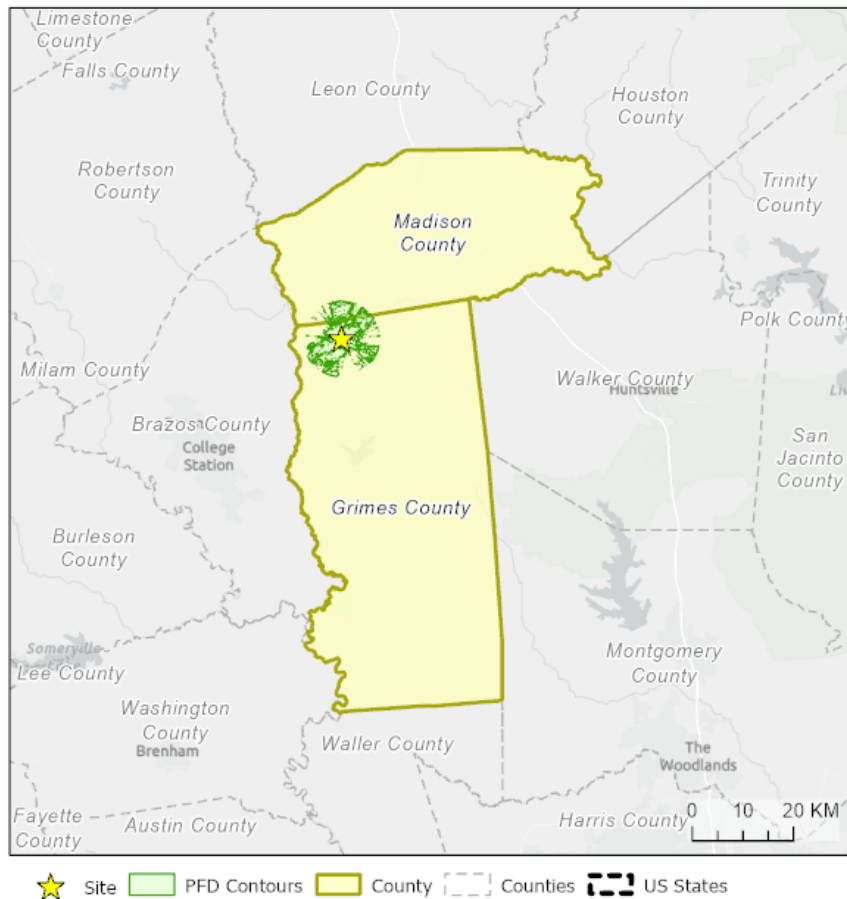
Commission should grant this application; no additional interference protection beyond these existing safeguards to UMFUS licensees in the County is required.

Section 25.136(a)(4)(i) (no more than three co-frequency FSS gateways in one county)

Section 25.136(a)(4)(i) of the Commission’s rules requires the applicant to demonstrate that “[t]here are no more than two other authorized earth stations operating in the 27.5-28.35 GHz band within the county where the proposed earth station is located that meet the criteria contained in either paragraph (a)(1), (2), (3), or (4) of this section.”⁸ For purposes of this rule, “multiple earth stations that are collocated with or at a location contiguous to each other shall be considered as one earth station.”⁹

Figure 1 depicts the proposed earth station’s location in the County. The earth station location is denoted by a star, Grimes County and Madison County are shown in yellow, and the earth station contour is in green.

Figure 1. Location of Amazon Earth Station



⁸ 47 C.F.R. § 25.136(a)(4)(i).

⁹ *Id.*

As of the date of this submission, the Commission's International Bureau Filing System shows no other FSS earth station license application using the 27.5-28.35 GHz band in the County.¹⁰ As there are no more than two other authorized earth stations operating in the 27.5-28.35 GHz band within the County, this gateway application complies with section 25.136(a)(4)(i).

¹⁰ See *International Bureau Filing System*, FCC, <http://licensing.fcc.gov/myibfs/> (last visited April 1, 2023).

PFD Contour Generation –Sections 25.136(a)(4)(ii)–(iv)

To verify compliance with sections 25.136(a)(4)(ii)-(iv), Amazon generated the gateway's -77.6 dBm/m²/MHz PFD contour as shown in Figure 2. The gateway's maximum aggregate equivalent isotropic radiated power ("EIRP") from its four active antennas will be -19.0 dBW/MHz at the horizon in any azimuth direction based on a simulated antenna pattern.¹¹

Table 1. Amazon Earth Station Parameters

Field	Value	Units
County	Grimes, TX	
Latitude	30° 48' 10.9" N	
Longitude	96° 5' 23.8" W	
Simulation Frequency	27.5	GHz
Number of Active Antennas	4	
Antenna Centerline Height (Above Ground Level)	1.9 - 2.74, depending on azimuth and elevation ¹²	meters
Worst-case Antenna Gain toward the Horizon	-5.0	dBi
Average Gain toward the Horizon	-10.0	dBi
RF Transmit Power	-17.0	dBW/MHz
Aggregate EIRP toward the Horizon ¹³	-19.0	dBW/MHz

Amazon generated the proposed earth station's -77.6 dBm/m²/MHz PFD contour using internal satellite communications and geospatial analysis software that has had its validity verified using Visualyse Pro. The PFD contours were generated by creating a raster grid of measurement points located 10 meters above ground level and surrounding the earth station, and calculating the path attenuation, received power and power flux-density to each point. To assess radio propagation, Amazon used ITU-R Recommendation P.452 and National Aeronautics and Space Administration Shuttle Radar Topography Mission digital topology data, which employs a 1-arc second

¹¹ The gateway will have six antennas, but no more than four antennas will transmit on the same channel at any given time. The extra antennas will be used to reduce downtime by being passively pre-positioned to begin communicating with a rising satellite immediately after an active satellite sets. The extra antennas will also be used to ensure earth station availability in the event of an antenna failure.

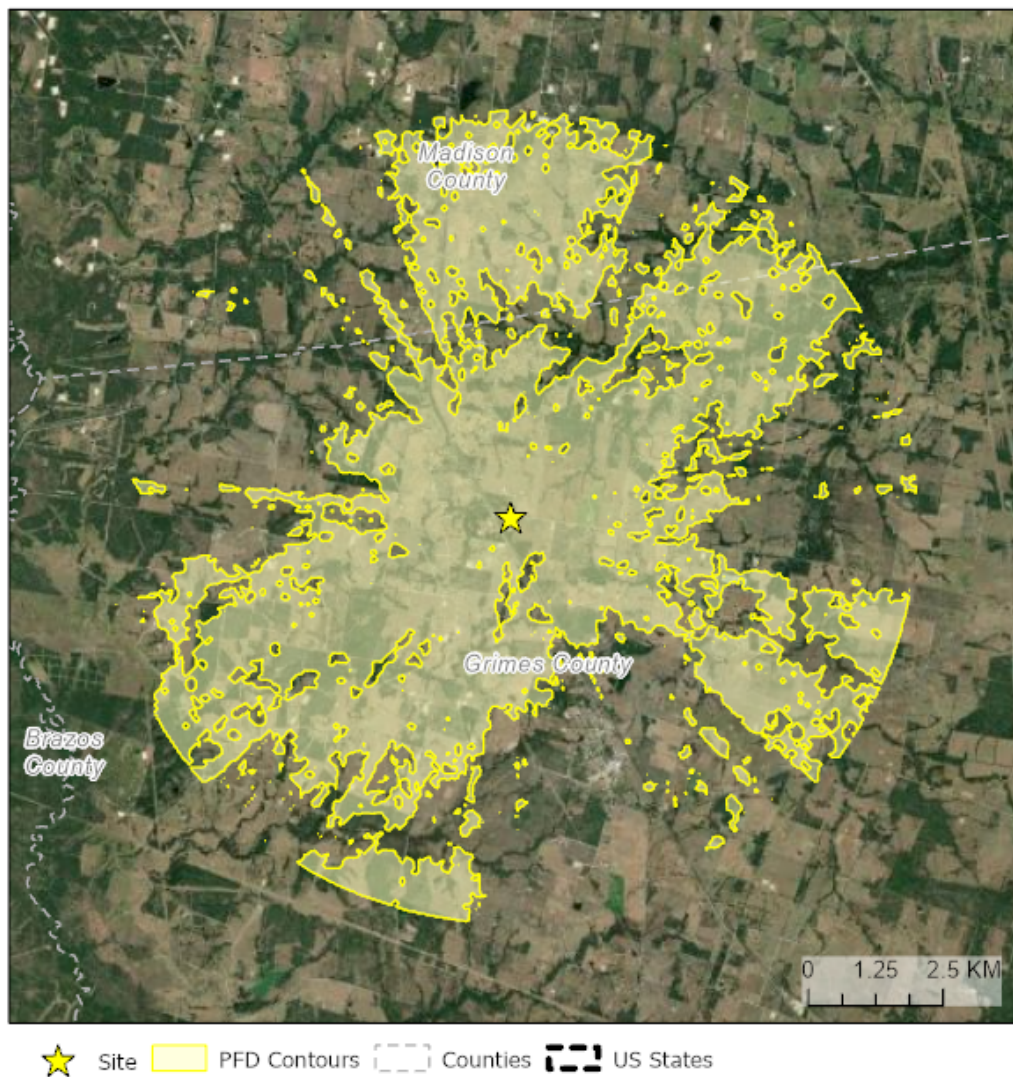
¹² The Amazon antennas will use X/Y mounts. The height of the center of radiation of the antenna will vary depending on the azimuth and elevation of the antenna. At minimum elevation, the height will be under 2.5 meters in all azimuth directions.

¹³ This figure is based on three of the four active antennas operating at average off-axis gain in the direction of an UMFUS receiver 10 meters above ground level (-10 dBi) and one of the four active antennas operating at the worst case off-axis gain in the direction of an UMFUS receiver 10 meters above ground level (-5.0 dBi).

resolution.¹⁴ The antenna gain toward the horizon is derived from antenna manufacturer calculations.¹⁵ The PFD contour is generated using the worst-case input power density rather than the input power density during clear sky conditions.¹⁶

Figure 2 shows Amazon's PFD contour in Google Earth (shapefile attached in KML format) and confirms the contour complies with the Guidance.

Figure 2. Gateway PFD Contour (-77.6 dBm/m²/MHz)



¹⁴ See Guidance, 35 FCC Rcd at 6349 (computing PFD contours and protection zones at bullets 2 and 4). For the application of ITU-R Recommendation P.452, the sparse clutter category was assumed after visual inspection of the site.

¹⁵ See Guidance, 35 FCC Rcd at 6349 (computing PFD contours and protection zones at bullet 3).

¹⁶ See *id.* (computing PFD contours and protection zones at bullet 5).

Section 25.136(a)(4)(ii) (-77.6 dBm/m²/MHz PFD contour covering only certain population totals)

Section 25.136(a)(4)(ii) requires the applicant to demonstrate that “[t]he area in which the earth station generates a PFD, at 10 meters above ground level, of greater than or equal to -77.6 dBm/m²/MHz, together with the similar area of any other earth station authorized pursuant to paragraph (a) of this section, does not cover, in the aggregate, more than the amount of population of the UMFUS license area within which the earth station is located as noted in table 2 to this paragraph (a)(4)(ii).”¹⁷ The table is reproduced below:

Table 2. Section 25.136(a)(4)(ii) Population Limits

Population with UMFUS license area	Maximum permitted aggregate population within -77.6 dBm/m²/MHz PFD contour
Greater than 450,000	0.1 percent of population in UMFUS license area.
Between 6,000 and 450,000	450 people.
Fewer than 6,000	7.5 percent of population in UMFUS license area.

The PFD contour overlaps several census blocks, all within Grimes and Madison counties. These counties’ populations total 29,268 and 13,455 people respectively, according to 2020 U.S. Census Bureau data.¹⁸ As a result, the maximum population permitted within the FSS gateway’s -77.6 dBm/m²/MHz PFD contour is 450 people. Amazon’s analysis demonstrates that the proposed gateway’s PFD contour covers 186 people in Grimes County and 69 people in Madison County. This is less than the 450 limit in each county—using 2020 U.S. Census Bureau data and the actual area method.¹⁹

Section 25.136(a)(4)(ii) considers the aggregate population covered by the proposed earth station and the FSS earth stations operating in the 27.5-28.35 GHz band within the County. At the time of filing, there are no other earth station license applications within Grimes County or Madison County.²⁰ Therefore, the Amazon earth station’s PFD contour does not exceed the section 25.136(a)(4)(ii) aggregate population coverage allowance of 450 people for either Grimes County or Madison County.

Figure 3 shows in yellow the census blocks that are fully or partially covered by the PFD contour. Table 3 shows the total population, fractional area coverage, and the resulting calculated

¹⁷ 47 C.F.R. § 25.136(a)(4)(ii).

¹⁸ See *Grimes County, TX & Madison County, TX*, U.S. Census Bureau, <https://bit.ly/3xi89Wv> (last visited April 1, 2023).

¹⁹ See Guidance, 35 FCC Rcd at 6350 (determining estimated aggregate population coverage at bullet 2).

²⁰ See *supra* note 10.

population coverage for each fully and partially covered census block with non-zero population. Table 4 shows the total population covered in each county that the PFD contour overlaps.

Figure 3. Census Block and Population Coverage of Gateway PFD Contour

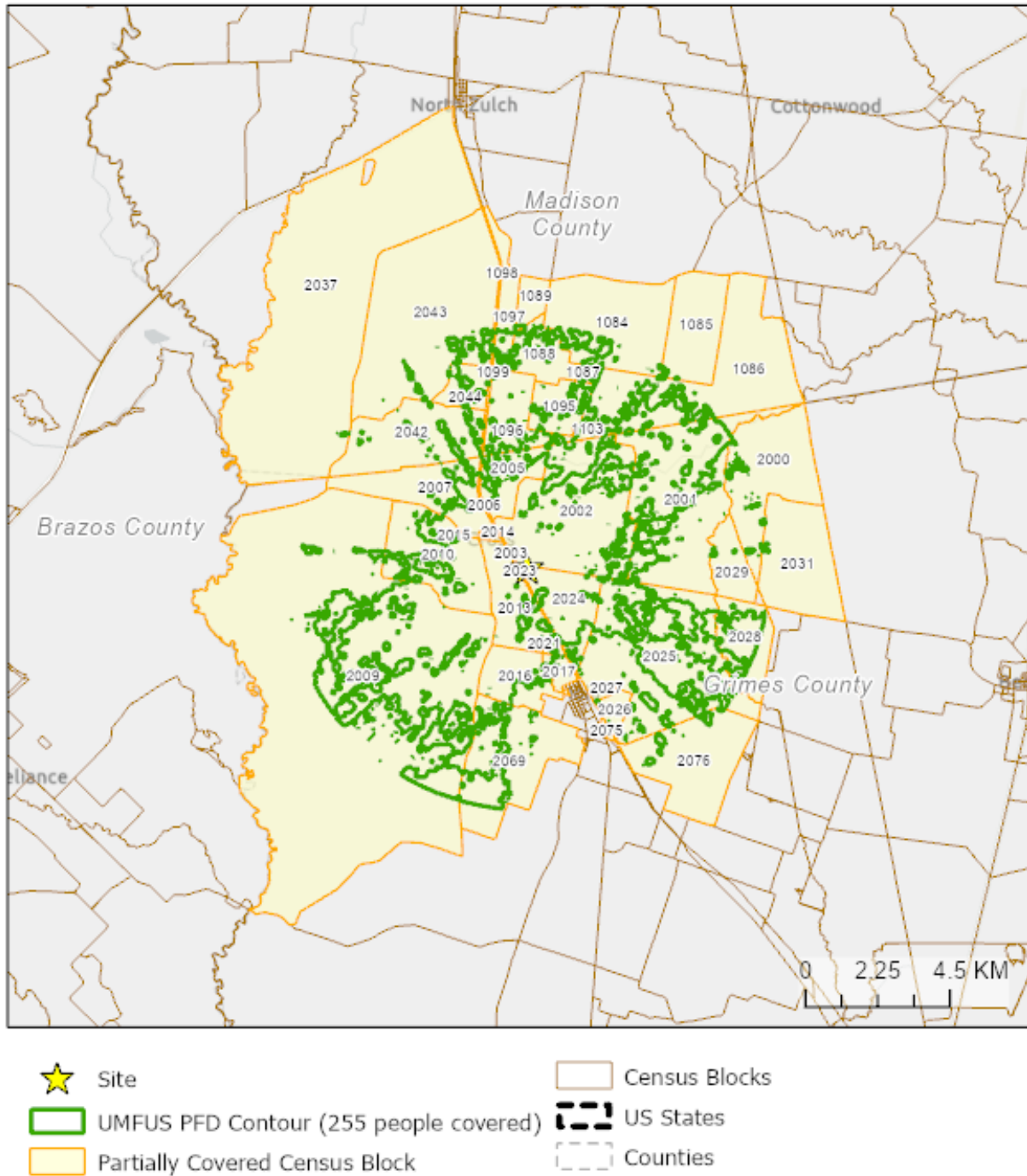


Table 3. PFD Contour Population Coverage, by Census Block (Blocks with Zero Population Not Listed)

State	County	Block ID	Block Population	Coverage Fraction	Covered Population
Texas	Grimes	481851803042000	12	2.7%	0
Texas	Grimes	481851803042001	45	48.6%	22
Texas	Grimes	481851803042002	27	76.3%	21
Texas	Grimes	481851803042005	19	63.9%	12
Texas	Grimes	481851803042007	23	28.4%	7
Texas	Grimes	481851803042009	47	24.1%	11
Texas	Grimes	481851803042010	40	58.7%	23
Texas	Grimes	481851803042013	32	90.6%	29
Texas	Grimes	481851803042015	12	100.0%	12
Texas	Grimes	481851803042016	6	71.6%	4
Texas	Grimes	481851803042017	4	17.5%	1
Texas	Grimes	481851803042021	2	44.6%	1
Texas	Grimes	481851803042024	13	83.7%	11
Texas	Grimes	481851803042025	57	40.8%	23
Texas	Grimes	481851803042026	8	2.3%	0
Texas	Grimes	481851803042028	5	42.7%	2
Texas	Grimes	481851803042029	15	0.7%	0
Texas	Grimes	481851803042031	9	0.5%	0
Texas	Grimes	481851803042069	26	22.9%	6
Texas	Grimes	481851803042075	7	4.9%	0
Texas	Grimes	481851803042076	28	2.8%	1
Texas	Madison	483130003001084	22	8.3%	2
Texas	Madison	483130003001085	14	0.8%	0
Texas	Madison	483130003001086	54	14.3%	8
Texas	Madison	483130003001088	16	80.6%	13
Texas	Madison	483130003001089	17	2.6%	0
Texas	Madison	483130003001095	7	80.4%	6
Texas	Madison	483130003001096	2	81.2%	2
Texas	Madison	483130003001097	13	23.0%	3
Texas	Madison	483130003001099	12	98.8%	12
Texas	Madison	483130003001103	14	39.4%	6
Texas	Madison	483130003002037	316	0.0%	0
Texas	Madison	483130003002042	12	9.3%	1
Texas	Madison	483130003002043	76	4.4%	3
Texas	Madison	483130003002044	25	51.7%	13

Table 4. PFD Contour Population Coverage, by County

State	County	County Population	Allowable Population Coverage	Covered Population
Texas	Grimes	29,268	450	186
Texas	Madison	13,455	450	69

Section 25.136(a)(4)(iii) (major event venue, urban mass transit route, passenger railroad, cruise ship port, Interstate, Other Freeways and Expressways, or Other Principal Arterial in the -77.6 dBm/m²/MHz PFD contour)

Section 25.136(a)(4)(iii) requires an applicant to demonstrate as follows:

The area in which the earth station generates a PFD, at 10 meters above ground level, of greater than or equal to -77.6 dBm/m²/MHz does not contain any major event venue, urban mass transit route, passenger railroad, or cruise ship port. In addition, the area mentioned in paragraph (a)(4)(ii) of this section shall not cross any of the following types of roads, as defined in functional classification guidelines issued by the Federal Highway Administration pursuant to 23 CFR 470.105(b): Interstate, Other Freeways and Expressways, or Other Principal Arterial. The Federal Highway Administration Office of Planning, Environment, and Realty Executive Geographic Information System (HEPGIS) map contains information on the classification of roads. For purposes of this rule, an urban area shall be an Adjusted Urban Area as defined in section 101(a)(37) of Title 21 of the United States Code.²¹

Using Google Earth, visual analysis, and shapefile data available on data.gov and the U.S. Census Bureau website, Amazon determined that the proposed gateway's -77.6 dBm/m²/MHz PFD contour does not contain any major event venue, urban mass transit route, passenger railroad, or cruise ship port. As shown in Figure 2 and Figure 4, the PFD contour does not overlap any such infrastructure²². Further, the PFD contour does not cross any Interstate, Other Freeways and Expressways, or Other Principal Arterial, as defined by the Federal Highway Administration Office of Planning, Environment, and Realty Executive Geographic Information System.²³ Amazon also consulted the Texas Department of Transportation functional classifications to confirm that the contour does not intersect any Other Freeways and Expressways or Other Principal Arterials.²⁴ The proposed gateway, therefore, is consistent with the requirements of section 25.136(a)(4)(iii).

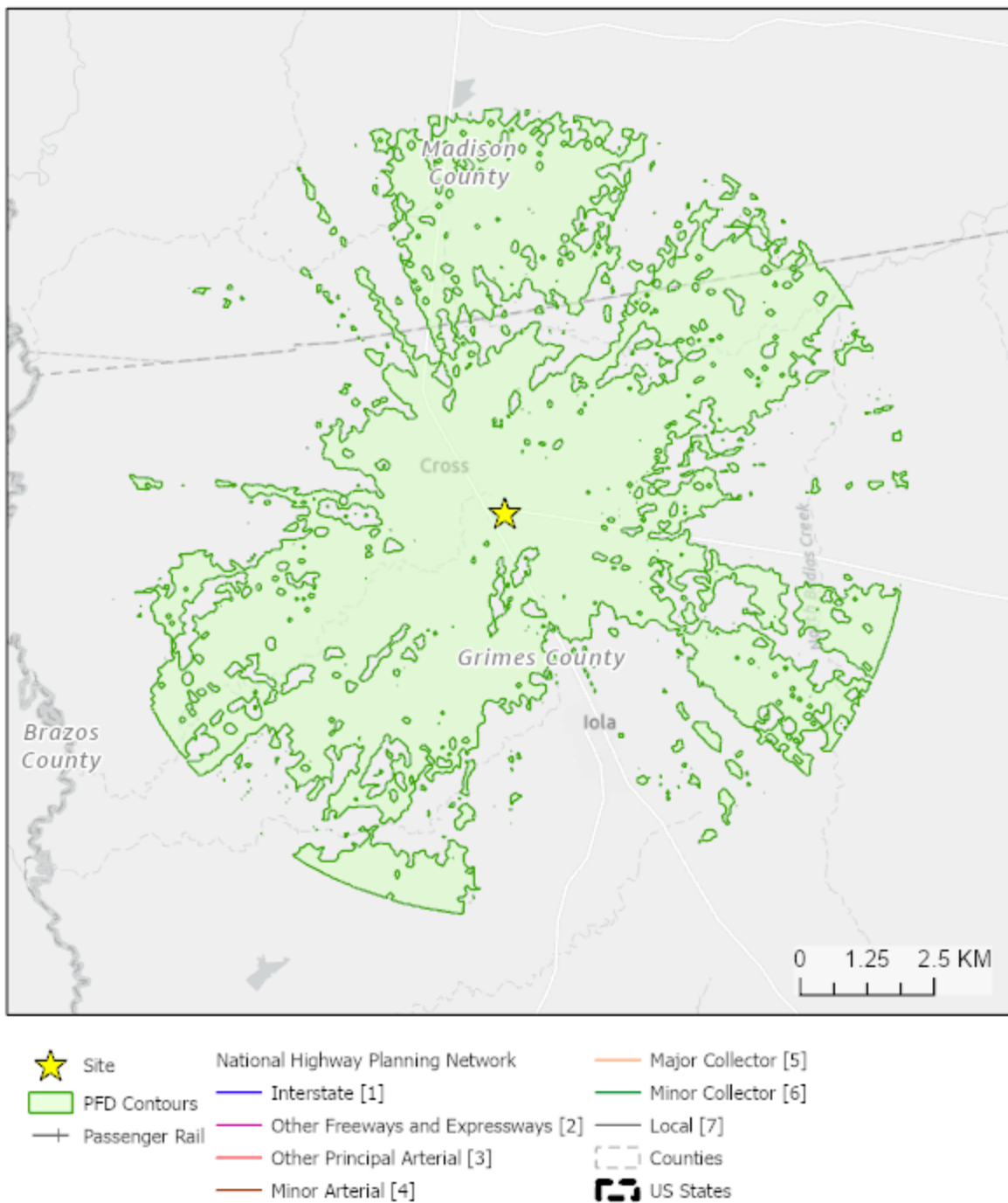
²¹ 47 C.F.R. § 25.136(a)(4)(iii).

²² As Texas State Routes 39, 244, and 1696 are not catalogued in the National Network, they do not appear in Figure 4. However, at the state level they are classified as "Major Collectors" and as such do not introduce noncompliance with 25.136(a)(4)(iii).

²³ See *Planning, Environment, Realty (HEP) HEPGIS*, U.S. Dep't of Transp. Fed. Highway Admin., <https://bit.ly/35HT32A> (last visited April 1, 2023).

²⁴ See Guidance, 35 FCC Rcd at 6351 (providing guidance regarding definition of roadways at bullet 2); *Functional Classification Maps*, Texas Department of Transportation, <https://bit.ly/2plhFp7> (last visited April 1, 2023).

Figure 4. -77.6 dBm/m²/MHz PFD contour overlaid with major roadways and passenger railroads²⁵



Section 25.136(a)(4)(iv) (coordination with existing UMFUS licensees located within a PFD contour greater than or equal to -77.6 dBm/m²/MHz)

Section 25.136(a)(4)(iv) requires the applicant to demonstrate that it “has successfully completed frequency coordination with the UMFUS licensees within the area in which the earth station generates a PFD, at 10 meters above ground level, of greater than or equal to -77.6 dBm/m²/MHz with respect to existing facilities constructed and in operation by the UMFUS licensee.”²⁶ The applicant is required to use the applicable processes in section 101.103(d) in coordinating with UMFUS licensees.²⁷

Exhibit C, the Comsearch Report, establishes that Amazon has completed coordination with existing UMFUS licensees, as section 25.136(a)(4)(iv) requires.²⁸

²⁵ There are no passenger railroads within the vicinity of the PFD contour. As such, the legend item does not appear in the figure. To the extent rails are located in the vicinity of the PFD contour, the rail lines carry freight, not passengers. *Cf. id.*

²⁶ 47 C.F.R. § 25.136(a)(4)(iv).

²⁷ *See id.*

²⁸ *See id.* § 101.103(d).

EXHIBIT B (RADIATION HAZARD ANALYSIS)

Introduction

In accordance with OET Bulletin 65,¹ this Radiation Hazard Analysis demonstrates that the Amazon 2.4m gateway antennas comply with Commission limits for human exposure to radiofrequency (“RF”).

OET Bulletin 65 and section 1.1310 of the Commission’s rules specify two separate tiers of maximum permissible exposure (“MPE”).² The occupational/controlled MPE limit is 5 milliwatts per centimeter squared averaged over any six minute period.³ The general population/uncontrolled MPE limit is 1 milliwatt per centimeter squared averaged over any thirty minute period.⁴

Amazon calculated the (i) power over the sub-reflector and antenna surface and (ii) near-field and far-field power density for the main and off-axis beams and confirms compliance with both MPE tiers’ limits for all regions.

- **Occupational/controlled exposure.** This population will not experience harmful radiation levels, as determined by the Commission. The results for the worst-case scenario (near-field, main-beam power density) support this conclusion.
- **General population/uncontrolled exposure.** This population will not experience harmful radiation levels, as determined by the Commission. The results for the worst-case scenario (near-field, off-axis power density) support this conclusion. Furthermore, gateways will be deployed in occupational/controlled exposure environments within access-controlled, locked facilities and will be inaccessible to the general population.

Input Parameters

Input Parameter	Unit	Value
Aperture Diameter	meters	2.4
Aperture Radius	meters	1.20
Sub-reflector Diameter	meters	0.408
Sub-reflector Radius	meters	0.204
Aperture Efficiency	Percentage	46%
Frequency	MHz	28750.00
Total Transmitter Power	W	80
Minimum Elevation Angle	degrees	20.00

¹ See FCC OET Bulletin 65, Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields (Aug. 1997) (“OET Bulletin 65”). Amazon is aware of and will comply with the recently modified rules for radiofrequency exposure that are relevant to fixed earth stations. *See generally Proposed Changes in the Commission’s Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields et al.*, Second Report and Order et al., 34 FCC Rcd 11687 (2019).

² See 47 C.F.R. § 1.1310.

³ See OET Bulletin 65 at Appendix A, Table 1(A).

⁴ See *id.* at Appendix A, Table 1(B).

Calculations

Calculated Variables	Unit	Value	Variable	OET Ref
Wavelength	meters	0.01	$\lambda = \frac{c}{f}$	
Area of Reflector	meters^2	4.52	$A = \pi r^2$	
Area of Sub-reflector	meters^2	0.1307	$A_{sub} = \pi r^2$	
Antenna Gain		240499.6	$G = \frac{\eta 4\pi A}{\lambda^2}$	(15)
Antenna Gain	dBi	53.8	$G_{dBi} = 10 * \log_{10}(G)$	
Near-Field Distance	meters	138.10	$R_{nf} = \frac{D^2}{4\lambda}$	(12)
Far-Field Distance	meters	331.43	$R_{ff} = \frac{0.6D^2}{\lambda}$	(16)
Far-Field Off-Axis Gain	dBi	-0.53	$G_{ff(dBi)} = 29 - 25\log_{10}(\theta)$ $\theta = \text{min elevation} = 20^\circ$	
Far-Field Off-Axis Gain		0.89	$G_{ff} = 10^{\left(\frac{G_{ff(dBi)}}{10}\right)}$	
Power over Sub-reflector	mW/cm^2	244.76	$S_{surface} = \frac{4P}{A_{sub}}$	(11)
Power over Antenna Surface	mW/cm^2	7.07	$S_{surface} = \frac{4P}{A}$	(11)
Near-Field Power Density (Main Beam)	mW/cm^2	3.25	$S_{nf} = \frac{16\eta P}{\pi D^2}$	(13)
Near-Field Power Density (Off-Axis)	mW/cm^2	0.033	$S_{nf} = \frac{16\eta P}{100\pi D^2}$	(13) ⁵
Far-Field Max Power Density (Main Beam)	mW/cm^2	1.39	$S_{ff} = \frac{PG}{4\pi R^2}$	(18)
Far-Field Max Power Density (Off-Axis)	mW/cm^2	0.000	$S_{ff off-axis} = \frac{PG_{ff}}{4\pi R^2}$	(18) ⁶

Additional Safety Measures

Access to Amazon's antennas will be carefully controlled. The antennas will be enclosed by a 3m tall fence with locked gates. There will be clear and visible signage that will warn individuals of potential RF exposure risk. Each antenna will have an emergency stop switch that is to be

⁵ See *id.* at 30 ("For off-axis calculations in the near-field and in the transition region it can be assumed that, if the point of interest is at least one antenna diameter removed from the center of the main beam, the power density at that point would be at least a factor of 100 (20 dB) less than the value calculated for the equivalent distance in the main beam see Reference [15]).").

⁶ See *id.* ("For practical estimation of RF fields in the off-axis vicinity of aperture antennas, use of the antenna radiation pattern envelope can be useful. For example, for the case of an earth station in the fixed-satellite service, the Commission's Rules specify maximum allowable gain for antenna sidelobes not within the plane of the geostationary satellite orbit, such as at ground level. . . . Use of the gain obtained from these relationships in simple far-field calculations, such as Equation 18, will generally be sufficient for estimating RF field levels in the surrounding environment, since the apparent aperture of the antenna is typically very small compared to its frontal area.").

engaged whenever personnel are working on or close to the antenna. The emergency stop switch will disable all RF transmissions from the antenna. All pedestrian gates shall be fully access controlled. Emergency or delivery gates shall be secured with a lock and monitored. Additionally, the transmitter will be turned off during maintenance activities.

Results

In a controlled area accessible to the occupational population, the peak near-field power density (3.25 mW/cm^2) and peak far-field power density (1.39 mW/cm^2) levels do not exceed the MPE limit of 5 mW/cm^2 averaged over a period of six minutes.

In an uncontrolled area accessible to the general population, the off-axis near-field power density (0.033 mW/cm^2) and off-axis far-field power density (0.000 mW/cm^2) levels are below the MPE limit of 1 mW/cm^2 averaged over a period of thirty minutes.⁷

This Radiation Hazard Analysis demonstrates that harmful levels of radiation will not occur in the regions accessible by both the occupational and general populations.

⁷ The minimum elevation angle of 20 degrees mostly prohibits the potential for the general population to be affected by the peak power density levels. Additionally, the constant repositioning of the antennas as they track Kuiper System low-earth orbit satellites also ensures that the average power density levels will be significantly reduced when averaged over any six-minute period.

EXHIBIT C (COMSEARCH REPORT)

FREQUENCY COORDINATION AND INTERFERENCE ANALYSIS REPORT

Prepared for
Kuiper Systems LLC.
IOLA, TX
Satellite Earth Station

Prepared By:
COMSEARCH
21515 Ridgetop Circle, Suite 300
Sterling, VA 20166
February 14, 2023

TABLE OF CONTENTS

1. CONCLUSIONS	3
2. SUMMARY OF RESULTS	4
3. SUPPLEMENTAL SHOWING	5
4. EARTH STATION COORDINATION DATA.....	8
5. CERTIFICATION.....	12

1. CONCLUSIONS

An interference study considering all existing, proposed and prior coordinated microwave facilities within the coordination contours of the proposed earth station demonstrates that this site will operate satisfactorily with the common carrier microwave environment. Further, there will be no restrictions of its operation due to interference considerations.

2. SUMMARY OF RESULTS

A number of great circle interference cases were identified during the interference study of the proposed earth station. Each of the cases, which exceeded the interference objective on a line-of-sight basis, was profiled and the propagation losses estimated using NBS TN101 (Revised) techniques. The losses were found to be sufficient to reduce the signal levels to acceptable magnitudes in every case.

3. SUPPLEMENTAL SHOWING

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations.

Coordination data for this earth station was sent to the below listed carriers with a letter dated 01/06/2023.

Company

3 Rooms Communications LLC
3rd Coast Internet
AMA Communications, LLC
AMG Technology Investment Group LLC
AT&T Corp.
AT&T Mobility Spectrum LLC - North Texas
AT&T Mobility Spectrum LLC - South Texas
AT&T Mobility of Galveston, LLC
Air Canopy Internet Services, Inc.
Alvin Independent School District
BNSF Railway Company
Baytown, City of
BelWave Communications
Business Only Broadband, LLC
Cedar Park, City of
Cellco Partnership - Texas
Cellco Partnership -Texas/Houston GC
Cellco Partnership-C TX/LA/AR/OK
Chambers, County of
Channel Industry Mutual Aid
Cheniere Corpus Christi Pipeline, LP
Chevron Phillips Chemical Company LP
Cingular Wireless of Texas RSA #16 LP
City of Bee Cave
City of Belton
City of Cedar Park TX
City of Dallas
City of Farmers Branch Texas
City of Grand Prairie
City of Houston
City of Leander
City of Pflugerville
City of Round Rock
City of Schertz
City of Sugarland, Texas
City of University Park
Clearwire Spectrum Holdings III, LLC
Community Internet Providers LLC
Conterra Ultra Broadband, LLC
Dallas Area Rapid Transit Authority

Digitex.com
Dish Wireless LLC
ECTISP Inc.
East Texas Electric Cooperative, Inc
Electronic Corporate Pages, Inc.
Elgin Independent School District
Emmis Austin Radio Broadcasting
Entercom License, LLC
Enterprise Products Operating, LLC
Evolve Cellular Inc
Faith Communications LLC
Formosa Plastics Corporation
Fort Worth, City of
Global Telecom & Technology Americas
Graham Media Group, Houston, Inc
Granbury, City of
Gray Television Licensee, LLC (KWTX-KBTX
Guadalupe Valley Electric Coop., Inc.
HC Wireless, LLC
HILCO Electric Cooperative, Inc.
Harris County Universal Services
Hood County Sheriffs Department
Jackson Electric Cooperative, Inc.
Jefferson, County Of
KN Telecommunications, Inc.
KVUE Television, Inc.
KXLN License Partnership, L..P.
Kaufman County Sheriff Department
Klein Independent School District
Legacy ISP, LLC
Legacy Texas Bank
MHO Networks
Manor Independent School
Midlothian Independent School District
NDemand Wireless, LLC
NW Communications of Austin, Inc.
NW Communications of Texas, Inc.
Netspend Corporation
New Cingular Wireless PCS LLC - N Texas
New Cingular Wireless PCS LLC - S Texas
Nexstar Media Inc.
One Ring Networks, Inc.
Pacific Communications
Particle Communications Wholesale, Inc.
Resound Networks
Silvers, Neal
Skynet Communications (Houston)
South East Texas Regional Planning Com
Southern Broadband LLC
Spring Brach Independent School District
Sprint Spectrum LLC
Sprintcom, Inc
T-Mobile License LLC
TMN, Inc.
TXWI Net LLC
Targa Midstream Services LLC

Texas Disposal Systems
Texas New Mexico Power Company
Texas RSA 7B3, LLC
The Dow Chemical Company
Towerstream Corp.
Travis County ESD No 12
Travis County Water District No 17
USFon, Inc.
Union Pacific Railroad Company
Univ of Texas Southwestern Medical
University of Texas Medical Branch
VGI Technology, Inc
VTX Communications LLC
Verizon Wireless (VAW) LLC - Texas
Wiline Spectrum Holdings LLC
XO Communications, LLC

4. EARTH STATION COORDINATION DATA

This section presents the data pertinent to frequency coordination of the proposed earth station that was circulated to all carriers within its coordination contours.

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Date: 02/14/2023
Job Number: 230106COMSGE01

Administrative Information

Status: ENGINEER PROPOSAL
Call Sign:
Licensee Code: KUIPER
Licensee Name: Kuiper Systems LLC.

Site Information

IOLA, TX

Venue Name:
Latitude (NAD 83): 30° 48' 10.9" N
Longitude (NAD 83): 96° 5' 23.8" W
Climate Zone: A
Rain Zone: 2
Ground Elevation (AMSL): 107.8 m / 353.7 ft

Link Information

Satellite Type: Low Earth Orbit
Mode: TR - Transmit-Receive
Modulation: Digital
Minimum Elevation Angle: 20.0°
Azimuth Range: 0.0° to 360°
Antenna Centerline (AGL): 2.74 m / 9.0 ft

Antenna Information

Receive - FCC32

Transmit - FCC32

Manufacturer	Kuiper	Kuiper
Model	Model 24001	Model 24001
Gain / Diameter	49.0 dBi / 2.4 m	53.8 dBi / 2.4 m
3-dB / 15-dB Beamwidth	0.77° / 1.70°	0.49° / 1.17°
Max Available RF Power (dBW/4 kHz)	-41.0	-41.0
(dBW/MHz)	-17.0	-17.0
Maximum EIRP (dBW/4 kHz)	12.8	12.8
(dBW/MHz)	36.8	36.8
Interference Objectives:	Long Term	-156.0 dBW/MHz 20%
	Short Term	-146.0 dBW/MHz 0.01%
		-151.0 dBW/4 kHz 20%
		-128.0 dBW/4 kHz 0.0025%

Frequency Information

Receive 18.0 GHz

Transmit 28.0 GHz

Emission / Frequency Range (MHz)	50M0G7D - 500MG7D / 17800.0 - 18600.0 50M0G7D - 500MG7D / 18800.0 - 20200.0	50M0G7D - 500MG7D / 27500.0 - 30000.0
Max Great Circle Coordination Distance	247.0 km / 153.5 mi	25.0 km / 15.5 mi
Precipitation Scatter Contour Radius	100.0 km / 62.1 mi	100.0 km / 62.1 mi

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Coordination Values

IOLA, TX

Licensee Name Kuiper Systems LLC.
Latitude (NAD 83) 30° 48' 10.9" N
Longitude (NAD 83) 96° 5' 23.8" W
Ground Elevation (AMSL) 107.8 m / 353.7 ft
Antenna Centerline (AGL) 2.74 m / 9.0 ft
Antenna Model Kuiper 2.4 meter
Antenna Mode Receive 18.0 GHz Transmit 28.0 GHz
Interference Objectives: Long Term -156.0 dBW/MHz 20% -151.0 dBW/4 kHz 20%
Short Term -146.0 dBW/MHz 0.01% -128.0 dBW/4 kHz 0.0025%
Max Available RF Power -41.0 (dBW/4 kHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Receive 18.0 GHz		Transmit 28.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)	Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	86.96	-0.50	247.00	-0.50	25.00
5	0.00	82.11	-0.50	247.00	-0.50	25.00
10	0.00	77.25	-0.50	247.00	-0.50	25.00
15	0.00	72.41	-0.50	247.00	-0.50	25.00
20	0.00	67.57	-0.50	247.00	-0.50	25.00
25	0.00	62.74	-0.50	247.00	-0.50	25.00
30	0.00	57.93	-0.50	247.00	-0.50	25.00
35	0.00	53.14	-0.50	247.00	-0.50	25.00
40	0.00	48.38	-0.50	247.00	-0.50	25.00
45	0.00	43.66	-0.50	247.00	-0.50	25.00
50	0.00	38.99	-0.50	247.00	-0.50	25.00
55	0.00	34.40	-0.50	247.00	-0.50	25.00
60	0.00	29.92	-0.50	247.00	-0.50	25.00
65	0.00	25.62	-0.50	247.00	-0.50	25.00
70	0.00	21.60	-0.50	247.00	-0.50	25.00
75	0.00	18.04	-0.50	247.00	-0.50	25.00
80	0.00	15.28	-0.50	247.00	-0.50	25.00
85	0.00	13.80	-0.50	247.00	-0.50	25.00
90	0.00	14.02	-0.50	247.00	-0.50	25.00
95	0.00	15.87	-0.50	247.00	-0.50	25.00
100	0.00	18.87	-0.50	247.00	-0.50	25.00
105	0.00	22.57	-0.50	247.00	-0.50	25.00
110	0.00	26.68	-0.50	247.00	-0.50	25.00
115	0.00	31.03	-0.50	247.00	-0.50	25.00
120	0.00	35.54	-0.50	247.00	-0.50	25.00
125	0.00	40.15	-0.50	247.00	-0.50	25.00
130	0.00	44.83	-0.50	247.00	-0.50	25.00
135	0.00	49.57	-0.50	247.00	-0.50	25.00
140	0.00	54.33	-0.50	247.00	-0.50	25.00
145	0.00	59.13	-0.50	247.00	-0.50	25.00
150	0.00	63.95	-0.50	247.00	-0.50	25.00
155	0.00	68.78	-0.50	247.00	-0.50	25.00
160	0.00	73.62	-0.50	247.00	-0.50	25.00
165	0.00	78.47	-0.50	247.00	-0.50	25.00
170	0.00	83.32	-0.50	247.00	-0.50	25.00
175	0.00	88.18	-0.50	247.00	-0.50	25.00
180	0.00	93.04	-0.50	247.00	-0.50	25.00
185	0.00	97.89	-0.50	247.00	-0.50	25.00

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
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Coordination Values

IOLA, TX

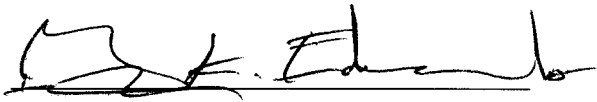
Licensee Name Kuiper Systems LLC.
Latitude (NAD 83) 30° 48' 10.9" N
Longitude (NAD 83) 96° 5' 23.8" W
Ground Elevation (AMSL) 107.8 m / 353.7 ft
Antenna Centerline (AGL) 2.74 m / 9.0 ft
Antenna Model Kuiper 2.4 meter
Antenna Mode Receive 18.0 GHz Transmit 28.0 GHz
Interference Objectives: Long Term -156.0 dBW/MHz 20% -151.0 dBW/4 kHz 20%
Short Term -146.0 dBW/MHz 0.01% -128.0 dBW/4 kHz 0.0025%
Max Available RF Power -41.0 (dBW/4 kHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Receive 18.0 GHz		Transmit 28.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)	Horizon Gain (dBi)	Coordination Distance (km)
190	0.00	102.75	-0.50	247.00	-0.50	25.00
195	0.00	107.59	-0.50	247.00	-0.50	25.00
200	0.00	112.43	-0.50	247.00	-0.50	25.00
205	0.00	117.26	-0.50	247.00	-0.50	25.00
210	0.00	122.07	-0.50	247.00	-0.50	25.00
215	0.00	126.86	-0.50	247.00	-0.50	25.00
220	0.00	131.62	-0.50	247.00	-0.50	25.00
225	0.00	136.34	-0.50	247.00	-0.50	25.00
230	0.00	141.01	-0.50	247.00	-0.50	25.00
235	0.00	145.60	-0.50	247.00	-0.50	25.00
240	0.00	150.08	-0.50	247.00	-0.50	25.00
245	0.00	154.38	-0.50	247.00	-0.50	25.00
250	0.00	158.40	-0.50	247.00	-0.50	25.00
255	0.00	161.96	-0.50	247.00	-0.50	25.00
260	0.00	164.72	-0.50	247.00	-0.50	25.00
265	0.00	166.20	-0.50	247.00	-0.50	25.00
270	0.00	165.98	-0.50	247.00	-0.50	25.00
275	0.00	164.13	-0.50	247.00	-0.50	25.00
280	0.00	161.13	-0.50	247.00	-0.50	25.00
285	0.00	157.43	-0.50	247.00	-0.50	25.00
290	0.00	153.32	-0.50	247.00	-0.50	25.00
295	0.00	148.97	-0.50	247.00	-0.50	25.00
300	0.00	144.46	-0.50	247.00	-0.50	25.00
305	0.00	139.85	-0.50	247.00	-0.50	25.00
310	0.00	135.17	-0.50	247.00	-0.50	25.00
315	0.00	130.43	-0.50	247.00	-0.50	25.00
320	0.00	125.67	-0.50	247.00	-0.50	25.00
325	0.00	120.87	-0.50	247.00	-0.50	25.00
330	0.00	116.05	-0.50	247.00	-0.50	25.00
335	0.00	111.22	-0.50	247.00	-0.50	25.00
340	0.00	106.38	-0.50	247.00	-0.50	25.00
345	0.00	101.53	-0.50	247.00	-0.50	25.00
350	0.00	96.68	-0.50	247.00	-0.50	25.00
355	0.00	91.82	-0.50	247.00	-0.50	25.00

5. CERTIFICATION

I HEREBY CERTIFY THAT I AM THE TECHNICALLY QUALIFIED PERSON RESPONSIBLE FOR THE PREPARATION OF THE FREQUENCY COORDINATION DATA CONTAINED IN THIS APPLICATION, THAT I AM FAMILIAR WITH PARTS 101 AND 25 OF THE FCC RULES AND REGULATIONS, THAT I HAVE EITHER PREPARED OR REVIEWED THE FREQUENCY COORDINATION DATA SUBMITTED WITH THIS APPLICATION, AND THAT IT IS COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

BY: _



Gary K. Edwards
Senior Manager
COMSEARCH
21515 Ridgetop Circle, Suite 300
Sterling, VA 20166

DATED: February 14, 2023

Ka-Band Earth Station – Iola, TX

Frequency Coordination Report

28 GHz



Prepared on Behalf of
KUIPER SYSTEMS, LLC

February 14, 2023



Table of Contents

1.	Summary of Results	- 1 -
2.	28 GHz Common Carrier and LTTS Coordination	- 1 -
3.	28 GHz UMFUS Coordination	- 2 -
4.	Earth Station Coordination Data	- 3 -
5.	Contact Information	- 7 -

1. Summary of Results

On behalf of KUIPER SYSTEMS, LLC, Comsearch performed a coordination notice under Section 25.203(c) and Section 25.136(a)(4) of the FCC's rules for all existing and proposed terrestrial licenses within the coordination contours of their proposed Ka-Band earth station in Iola, TX, which will transmit at 28 GHz¹. Prior-notification letters were sent to the licensees and a copy of the notification data is provided in section four of this report. The earth station coordination was finalized on February 14, 2023.

There are no unresolved objections from any of the incumbent 28 GHz licensees.

2. 28 GHz Common Carrier/LMDS and LTTS Coordination

In accordance with FCC Rules and Regulations, the Ka-Band earth station in Iola, TX was prior-coordinated by Comsearch. A notification letter and datasheets for this earth station were sent to the following 28 GHz common carrier fixed or LMDS microwave licensees. These licensees are authorized to operate temporary fixed operations from 27.5 – 29.5 GHz on a nationwide basis or local basis.

Licensee	Authorized Geographic Area
GeoLinks	Market-Based

A notification letter and datasheets for the Ka-Band earth station in Iola, TX were also sent to the following 28 GHz local television transmission licensee. This licensee is authorized to operate temporary fixed operations from 27.5 – 29.5 GHz on a nationwide basis.

Licensee	Authorized Geographic Area
None Identified	

No objections were received from the common carrier, LMDS or local television transmission service incumbents.

¹ The proposed earth station will operate in the 27.5 – 30.0 GHz portion of the Ka-Band.

3. 28 GHz UMFUS Coordination

There were two 28 GHz UMFUS licensees identified within the coordination distance of the proposed earth station. The proposed earth station will operate on frequencies that overlap Channel L1 & L2 of the UMFUS service. The total frequency allocation for Channels L1 & L2 of the UMFUS spectrum appears below.

Channel: **L1** 27.500 - 27.925 GHz
 L2 27.925 - 28.350 GHz

Licensee	Authorized Geographic Area
T-Mobile	Market Based
Verizon	Market Based

There are no Unresolved Objections from the UMFUS incumbents within coordination distance.



4. Earth Station Coordination Data

This section presents the data pertinent to the proposed Ka-Band earth station in Iola, TX. This data was circulated to all incumbent licensees in the shared 28 GHz frequency ranges.

Job Number: 230106COMSGE01

Administrative Information

Status ENGINEER PROPOSAL
Call Sign
Licensee Code KUIPER
Licensee Name Kuiper Systems LLC.

Site Information

IOLA, TX
Venue Name
Latitude (NAD 83) 30° 48' 10.9" N
Longitude (NAD 83) 96° 5' 23.8" W
Climate Zone A
Rain Zone 2
Ground Elevation (AMSL) 107.8 m / 353.7 ft

Link Information

Satellite Type Low Earth Orbit
Mode TR - Transmit-Receive
Modulation Digital
Minimum Elevation Angle 20.0°
Azimuth Range 0.0° to 360°
Antenna Centerline (AGL) 2.74 m / 9.0 ft

Antenna Information

Manufacturer
Model
Gain / Diameter
3-dB / 15-dB Beamwidth

Receive - FCC32

Kuiper
Model 24001
49.0 dBi / 2.4 m
0.77° / 1.70°

Transmit - FCC32

Kuiper
Model 24001
53.8 dBi / 2.4 m
0.49° / 1.17°

Max Available RF Power (dBW/4 kHz)
(dBW/MHz)

-41.0
-17.0

Maximum EIRP (dBW/4 kHz)
(dBW/MHz)

12.8
36.8

Interference Objectives: Long Term
Short Term

-156.0 dBW/MHz 20%
-146.0 dBW/MHz 0.01%

-151.0 dBW/4 kHz 20%
-128.0 dBW/4 kHz 0.0025%

Frequency Information

Emission / Frequency Range (MHz)

Receive 18.0 GHz

50M0G7D - 500MG7D / 17800.0 - 18600.0
50M0G7D - 500MG7D / 18800.0 - 20200.0

Transmit 28.0 GHz

50M0G7D - 500MG7D / 27500.0 - 30000.0

Max Great Circle Coordination Distance
Precipitation Scatter Contour Radius

247.0 km / 153.5 mi
100.0 km / 62.1 mi

25.0 km / 15.5 mi
100.0 km / 62.1 mi

Coordination Values	IOLA, TX		
Licensee Name	Kuiper Systems LLC.		
Latitude (NAD 83)	30° 48' 10.9" N		
Longitude (NAD 83)	96° 5' 23.8" W		
Ground Elevation (AMSL)	107.8 m / 353.7 ft		
Antenna Centerline (AGL)	2.74 m / 9.0 ft		
Antenna Model	Kuiper 2.4 meter		
Antenna Mode	Receive 18.0 GHz		Transmit 28.0 GHz
Interference Objectives: Long Term	-156.0 dBW/MHz	20%	-151.0 dBW/4 kHz 20%
Short Term	-146.0 dBW/MHz	0.01%	-128.0 dBW/4 kHz
0.0025%			
Max Available RF Power	-41.0 (dBW/4 kHz)		

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Receive 18.0 GHz		Transmit 28.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)	Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	86.96	-0.50	247.00	-0.50	25.00
5	0.00	82.11	-0.50	247.00	-0.50	25.00
10	0.00	77.25	-0.50	247.00	-0.50	25.00
15	0.00	72.41	-0.50	247.00	-0.50	25.00
20	0.00	67.57	-0.50	247.00	-0.50	25.00
25	0.00	62.74	-0.50	247.00	-0.50	25.00
30	0.00	57.93	-0.50	247.00	-0.50	25.00
35	0.00	53.14	-0.50	247.00	-0.50	25.00
40	0.00	48.38	-0.50	247.00	-0.50	25.00
45	0.00	43.66	-0.50	247.00	-0.50	25.00
50	0.00	38.99	-0.50	247.00	-0.50	25.00
55	0.00	34.40	-0.50	247.00	-0.50	25.00
60	0.00	29.92	-0.50	247.00	-0.50	25.00
65	0.00	25.62	-0.50	247.00	-0.50	25.00
70	0.00	21.60	-0.50	247.00	-0.50	25.00
75	0.00	18.04	-0.50	247.00	-0.50	25.00
80	0.00	15.28	-0.50	247.00	-0.50	25.00
85	0.00	13.80	-0.50	247.00	-0.50	25.00
90	0.00	14.02	-0.50	247.00	-0.50	25.00
95	0.00	15.87	-0.50	247.00	-0.50	25.00
100	0.00	18.87	-0.50	247.00	-0.50	25.00
105	0.00	22.57	-0.50	247.00	-0.50	25.00
110	0.00	26.68	-0.50	247.00	-0.50	25.00
115	0.00	31.03	-0.50	247.00	-0.50	25.00
120	0.00	35.54	-0.50	247.00	-0.50	25.00
125	0.00	40.15	-0.50	247.00	-0.50	25.00
130	0.00	44.83	-0.50	247.00	-0.50	25.00
135	0.00	49.57	-0.50	247.00	-0.50	25.00
140	0.00	54.33	-0.50	247.00	-0.50	25.00
145	0.00	59.13	-0.50	247.00	-0.50	25.00
150	0.00	63.95	-0.50	247.00	-0.50	25.00
155	0.00	68.78	-0.50	247.00	-0.50	25.00
160	0.00	73.62	-0.50	247.00	-0.50	25.00
165	0.00	78.47	-0.50	247.00	-0.50	25.00
170	0.00	83.32	-0.50	247.00	-0.50	25.00
175	0.00	88.18	-0.50	247.00	-0.50	25.00
180	0.00	93.04	-0.50	247.00	-0.50	25.00
185	0.00	97.89	-0.50	247.00	-0.50	25.00

Coordination Values		IOLA, TX	
Licensee Name		Kuiper Systems LLC.	
Latitude (NAD 83)		30° 48' 10.9" N	
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Short Term		-146.0 dBW/MHz 0.01%	-128.0 dBW/4 kHz
	0.0025%		

Max Available RF Power -41.0 (dBW/4 kHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Receive 18.0 GHz		Transmit 28.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)	Horizon Gain (dBi)	Coordination Distance (km)
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225	0.00	136.34	-0.50	247.00	-0.50	25.00
230	0.00	141.01	-0.50	247.00	-0.50	25.00
235	0.00	145.60	-0.50	247.00	-0.50	25.00
240	0.00	150.08	-0.50	247.00	-0.50	25.00
245	0.00	154.38	-0.50	247.00	-0.50	25.00
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270	0.00	165.98	-0.50	247.00	-0.50	25.00
275	0.00	164.13	-0.50	247.00	-0.50	25.00
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310	0.00	135.17	-0.50	247.00	-0.50	25.00
315	0.00	130.43	-0.50	247.00	-0.50	25.00
320	0.00	125.67	-0.50	247.00	-0.50	25.00
325	0.00	120.87	-0.50	247.00	-0.50	25.00
330	0.00	116.05	-0.50	247.00	-0.50	25.00
335	0.00	111.22	-0.50	247.00	-0.50	25.00
340	0.00	106.38	-0.50	247.00	-0.50	25.00
345	0.00	101.53	-0.50	247.00	-0.50	25.00
350	0.00	96.68	-0.50	247.00	-0.50	25.00
355	0.00	91.82	-0.50	247.00	-0.50	25.00



5. Contact Information

For questions or information regarding the 28 GHz Frequency Coordination Report, please contact:

Contact person:	Gary Edwards
Title:	Senior Manager, Satellite Services
Company:	Comsearch
Address:	21515 Ridgetop Circle, Suite 300, Sterling, VA 20166
Telephone:	703-726-5662
Fax:	703-726-5599
Email:	GEdwards@Comsearch.com
Web site:	www.comsearch.com

EXHIBIT D (ANTENNA PATTERN)

2.4m Antenna Pattern
Frequency: 27500 MHz (CoPol)
Gain: 53.8 dBi

