

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

In the Matter of	)	
	)	
Application of Speedcast	)	
Communications Inc. for a C- and Ku-	)	
band Earth Station in Motion (“ESIM”)	)	File No. SES-LIC-_____
Blanket License	)	
	)	
	)	

ESIM BLANKET LICENSE APPLICATION

By this application, Speedcast Communications Inc. (“Speedcast”) respectfully seeks an earth station in motion (“ESIM”) blanket license to operate 115 C- and Ku-band earth station aboard vessel (“ESV”) terminals to further enhance Speedcast’s authorized ESV network¹ and improve its ability to provide essential satellite communications services to vessels in motion seeking ubiquitous broadband connectivity. These terminals comprise the Cobham Sailor 900, Seatel 5012, and Intellian V150NX and V240MT terminals (the “User Terminals”).

Speedcast seeks to operate the terminals in the 3625-4200 MHz (space-to-Earth), 5850-6425 MHz (Earth-to-space), 10.92-12.75 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) bands to communicate with geostationary satellite orbit (“GSO”) fixed-satellite service (“FSS”) satellites on the Permitted List.²

I. DISCUSSION

Speedcast is a global provider of communications services that delivers critical satellite connectivity solutions for customers engaged in diverse operations throughout the world,

¹ See *Speedcast Communications, Inc.*, Grant, ICFS File No. SES-LIC-20240314-00706 (granted June 9, 2025).

² 47 C.F.R. § 25.115(k).

including maritime operations in and around the United States. Speedcast holds numerous earth station licenses to support its ongoing operations, including blanket licenses to operate numerous ESV terminal types in the C-band, Ku-band, and Ka-band.³

Consistent with Section 25.115 of the Commission's rules,⁴ Speedcast provides the operating parameters of the User Terminals in FCC Form 312 Schedule B. Speedcast includes the radiation hazard analyses for these User Terminals in Appendix A. Speedcast will comply with the mitigation measures set forth in those reports, as well as measures provided by the Commission in its 2019 Report and Order updating its radiofrequency exposure rules.⁵

Ku-Band Operations. The User Terminals will be utilized exclusively as offshore ESVs, and Speedcast requests authority to operate the User Terminals in the 10.7-12.7 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space) in U.S. territorial and international waters. These bands are allocated to the FSS on a primary or co-primary basis, and blanket earth station licensing is allowed in these bands.⁶ Speedcast recognizes that operations in the 10.7-11.7 GHz band are unprotected with respect to fixed service operations.⁷ While the 12.2-12.7 GHz band is not explicitly included in the Commission's frequency list for ESIMs communicating with GSO FSS systems, the Commission has authorized ESIM operations in the band and has clarified that Section 202(b) empowers the Commission to consider requests to operate in non-enumerated

³ See *supra*, note 1.

⁴ 47 C.F.R. § 25.115.

⁵ *Targeted Changes to the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*, Second Report and Order, 34 FCC Rcd 11687 (2019).

⁶ 47 CFR § 25.202(a)(10)(ii)(A)-(C); *id.* § 2.106 n. NG527A.

⁷ *Id.* § 2.106 n. NG527A(i).

bands on a case-by-case basis.⁸ Speedcast requests that the Commission take the same action here.

C-Band Operations. Speedcast also requests authority to operate in the 3625-4200 MHz (space-to-Earth) and 5850-6425 MHz (Earth-to-space) bands in U.S. territorial and international waters.⁹ In the bands 3600-3650 MHz (space-to-Earth) and 5850-5925 MHz (Earth-to-space), the use of the non-Federal FSS is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis.¹⁰ Further, the 3700-4200 MHz and 5925-6425 MHz bands are allocated internationally for FSS on a primary basis. Domestically, ESVs may be authorized to transmit in the 5925-6425 MHz band with GSO FSS satellites on a primary basis and receive FSS signals from GSO satellites in the 3700-4200 MHz band on an unprotected basis with respect to non-Federal mobile and fixed stations.¹¹

⁸ *SpaceX Services, Inc. Application for Blanket Authorization of Next-Generation Ku-Band Earth Stations in Motion; Kepler Communications Inc. Application for Blanket Authorization of Ku-Band Earth Stations on Vessels*, Order and Authorization, 37 FCC Rcd 7640 ¶ 10 (IB 2022); see also 47 C.F.R. § 25.202(b) (“Other frequencies and associated bandwidths of emission may be assigned on a case-by-case basis to space systems under this part in conformance with § 2.106 of this chapter and the Commission's rules and policies.”).

⁹ In April 2018, the Commission placed a freeze on the filing of new or modified applications for earth station licenses, receive-only earth station registrations, and fixed microwave licenses in the 3.7-4.2 GHz band, in order to preserve the landscape of authorized operations in the band during the pendency of the C-band clearing. *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band*, GN Docket No. 17-183, Public Notice, 33 FCC Rcd 3841 (IB/PSHSB/WTB 2018). This Commission has kept the freeze in place during the pendency of the Upper C-band clearing proceeding. See *Upper C-band (3.98–4.2 GHz); Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Draft Report and Order, Order of Proposed Modification, and Order on Reconsideration GN Docket Nos. 25-59, 18-122, FCC-CIRC2607-01, ¶ 11 n.26 (public draft rel. July 1, 2026). To the extent necessary, Speedcast requests that the Commission waive the freeze and process the C-band portion of the instant application without delay.

¹⁰ 47 C.F.R. § 2.106 n.US245.

¹¹ *Id.* § 25.202(a)(8); *id.* § 2.106 n.NG457A.

As discussed in more detail below, Speedcast will operate the User Terminals consistent with the requirements set forth in Section 25.228 of the Commission's rules.¹² Each User Terminal will be self-monitoring and automatically cease transmissions within 100 milliseconds of exceeding any emission limits included in its authorization, and will not resume transmission until the emission levels are corrected.¹³ User Terminals will be monitored and controlled by a Houston-based network control and monitoring center ("NCMC"). The User Terminals will comply with any "disable transmission" command from the NCMC and not resume transmissions until emission levels are corrected.¹⁴ ESV terminals will be installed by qualified installers with an understanding of the radiation environment and protection measures, and any accessible area of a terminal with radiation exposure levels exceeding 1.0mW/cm² will be properly labeled.¹⁵

Speedcast's 24/7 point of contact in the United States able to cease all emissions from ESVs is available at:

+1-832-668-2775
4400 South Sam Houston Parkway East
Houston, TX 77048 USA

For Ku-band operations, Speedcast will not operate the User Terminals: (i) in the 14.0-14.2 GHz band within 125 km of the NASA TDRSS facilities in Guam, White Sands, New Mexico and Blossom Point, Maryland; or (ii) in the 14.47-14.5 GHz band within 45 km of the radio observatory in St. Croix, Virgin Islands or Mauna Kea, Hawaii or within 90 km of the Arecibo Observatory in Puerto Rico, without first coordinating with the National

¹² *Id.* § 25.228.

¹³ *Id.* § 25.228(b).

¹⁴ *Id.* § 25.228(c).

¹⁵ *Id.* § 25.228(d).

Telecommunications Information Administration (“NTIA”) through NASA and the National Science Foundation, respectively.¹⁶ Speedcast additionally certifies that it plans to use a contention protocol, and its usage will be reasonable.¹⁷

Further, Speedcast certifies that it will comply with the requirements applicable to C-band operations set forth in Section 25.228(h), including prohibiting such operations on vessels smaller than 300 gross tons, completing coordination with potentially affected U.S.-licensed fixed service operators within 200 km from the baseline of the United States or within 200 km from an offshore installation prior to operation, ceasing transmissions where operations are in violation of coordination agreements, and shutting off an ESV transmitter if the EIRP spectral density towards the radio-horizon or the EIRP towards the radio-horizon in the 5925-6425 MHz band is exceeded.¹⁸ Speedcast additionally certifies that the aggregate off-axis EIRP density from all co-frequency earth stations transmitting simultaneously to the same target satellite receiving beam, not resulting from colliding data bursts transmitted pursuant to a contention protocol, will not exceed the off-axis EIRP density limits permissible for a single earth station.¹⁹

II. PUBLIC INTEREST STATEMENT

Grant of this application will serve the public interest by allowing Speedcast to augment its existing ESV network with new terminals for its customers using Speedcast’s network throughout U.S. and international waterways. Addition of these User Terminals will also help Speedcast deliver more expansive broadband satellite services to a wide array of users in offshore and other locations, including commercial vessels, private yachts, and other in-motion

¹⁶ *Id.* § 25.228(j).

¹⁷ *Id.* § 25.115(i).

¹⁸ *Id.* § 25.228(h).

¹⁹ *Id.* §§ 25.212(g), 25.218(d)(4).

maritime users, that may be unable to obtain communications services through alternative facilities. Speedcast's customers will be able to utilize high-speed Internet access, e-mail, voice and data services, including important emergency communications.

III. CONCLUSION

For the foregoing reasons, Speedcast respectfully requests that the Commission authorize use of the User Terminals to allow Speedcast to better serve its customers in places with limited connectivity.

Respectfully submitted,

/s/ Elaine Chow

Elaine Chow

Head of Regulatory Affairs

Speedcast Communications Inc.
4400 South Sam Houston Parkway East
Houston, TX 77048

September 10, 2026