

Compliance with FCC Report & Order (FCC96-377)

Vertex RSI Ku 6.3m

This exhibit demonstrates that the antenna at issue complies with FCC Report & Order 96-377. Also addressed is the potential harmful interference to US Navy shoreboard operations (RADAR) and the NASA space research activities in the 13.75 - 14.0 GHz band. The parameters for the earth station are shown below:

| <u>Earth Station Coordinates</u> | <u>Deg</u> | <u>Min</u> | <u>Sec</u> | |
|---|--------------------|------------|------------|-------|
| Latitude | 28 | 5 | 23.0 | North |
| Longitude | 80 | 38 | 20.0 | West |
| Location | Melbourne, Florida | | | |

| <u>Earth Station</u> | <u>Value</u> | <u>Unit</u> | <u>Symbol</u> |
|-----------------------------|--------------|-------------|----------------------|
| Antenna Diameter: | 6.3 | m | <i>D</i> |
| Antenna Transmit Gain: | 57.50 | dBi | <i>G</i> |
| Uplink Frequency (lower) | 13.8 | GHz | <i>f_l</i> |
| Uplink Frequency (upper) | 14.00 | GHz | <i>f_u</i> |
| Elevation Angle | 51.87 | Degrees | θ_e |
| Power Input to the Antenna: | 250.00 | W | <i>P</i> |

| <u>Satellite</u> | |
|-------------------------|-----------|
| Satellite Name | T14R |
| Orbital Longitude | 63.0 West |

| <u>Distance to Shoreline</u> | | | |
|-------------------------------------|-------|----|----------|
| Closest Distance to Shoreline | 10.00 | Km | <i>d</i> |

The above spectrum is shared with the Federal Government. Therefore, coordination in this band requires resolution data pertaining to potential interference between the earth station and both, Navy Department and NASA systems. Potential interference from the earth station could impact the Navy and/or NASA systems in two areas. These areas are noted in FCC Order 96-377 dated September 1996, and consist of (1) Radiolocation and radio navigation, and (2) Data Relay Satellites.

Potential Impact to Government Radiolocation (Shipboard Radar)

Radiolocation operations (RADAR) may occur anywhere in the 13.4 - 14.0 GHz frequency band aboard ocean going United States Navy ships. FCC Order 96-377 allcates the bottom 250 MHz of this 600 MHz band to the Fixed Satellite Service (FSS) on a co-primary basis with the radiolocation operations and provides for an interference proteciton level of -167 dBW/m²/4KHz.

Calculation of the power spectral density at antenna input is given by:

| | <u>Carrier 1</u> | <u>Carrier 2</u> | <u>Units</u> | <u>Symbol</u> |
|--------------------------------|------------------|------------------|--------------|-----------------------|
| Clear Sky EIPR | 58.60 | 66.60 | dBW | <i>EIRP</i> |
| Carrier Bandwidth | 5700 | 36000 | MHz | <i>BW_o</i> |
| Power Density at Antenna Input | -30.44 | -30.44 | dBW/4KHz | <i>PD_i</i> |

The proposed earth station will radiate toward the ocean according to its off-axis side-lope performance. A conservative analysis, using FCC standard reference pattern, results in off-axis antenna gains toward the ocean as follows:

The signal density at the shoreline, through free space is:

$$PDF = \text{Antenna Feed Power Density (dBW/4KHz)} + \text{Antenna Off-Axis Gain (dBi)} - \text{Spread Loss (dBw-m}^2\text{)}$$

| | <u>Carrier 1</u> | <u>Carrier 2</u> | | <u>Formula</u> |
|--|------------------|------------------|-------------------------|--|
| Antenna Dentity at Antenna Input | -30.44 | -30.44 | dBW/4KHz | <i>EIRP - G - 10log(BW_o/4KHz)</i> |
| Antenna Off-Axis Gain | -10.9 | -10.9 | dB | <i>32-25log(θ_e)</i> |
| Spread Loss | 91.0 | 91.0 | dBW-m ² | <i>10log(4πd²)</i> |
| PFD without Terrain Loss & Blockage | -132.3 | -132.3 | dBW/4KHz/m ² | |
| Terrain Loss* | 25.0 | 25.0 | dB | |
| Tree & Building Blockage | 10.0 | 10.0 | dB | |
| PFD with Terrain Loss | -167.3 | -167.3 | dBW/4KHz/m ² | |
| Margin below -167dBW/4KHz/m ² | 0.3 | 0.3 | dB | |

*does not include absortion loss and earth diffraction loss

The calculated Power Flux Density (PFD), including free space loss, to the closest shoreline location is below the 167 dBW/4KHz/m² inteference criteria by a positive margin for all carriers. Therefore, there will be no discernable interference to the US Navy Radar from the proposed earth station.

Potential Impact to NASA's Data Relay Satellite System (TDRSS)

The geographic location of the proposed earth station is outside the 390 Km radius coordination contour surrounding NASA's White Sands, New Mexico ground station complex. Therefore, the TDRSS space-to-earth link will not be impacted by the proposed earth station.

The TDRSS space-to-space link in the 13.772 to 13.778 GHz band is not within the operational frequency of the proposed system. Therefore, there will not be interference to the TFRSS space-to-space link.