

DENALI 20020, LLC (DENALI) hereby requests authority to operate their existing and licensed 6.1 meter Ku-band antenna using the Amazonas-2 geostationary satellite at 61° west longitude (“Amazonas-2”) as a point of communication to Call Sign E120043 in the 13.75 – 14.0 GHz band. Grant of this request will allow DENALI to better support their customer Panasonic Avionics Corporation. Amazonas 2 has been selected by Panasonic Avionics Corporation to provide Commercial in Flight IP Connectivity services.

Although the Amazonas-2 is already on the FCC’s Foreign Satellite Permitted List, this authority does not encompass the transponder pairings that transmit space-to-earth in the conventional Ku-band between 11.7 and 12.2 GHz, but receive earth-to-space transmissions in the extended Ku-band between 13.75 and 14.0 GHz.

The interference analysis attached to this proposed modification demonstrates that DENALI’s operations on Amazonas-2 in the extended Ku-band between 13.75 and 14.0 GHz will not affect U.S. Navy and National Aeronautics and Space Administration facilities.

The Amazonas-2 satellite is unique in both its coverage over certain key areas in the US and Mexico including the Baja peninsula. There is currently a lack of available standard band full transponders on the Amazonas-2 satellite, and it does not appear that full standard transponders which are required to be able to saturate will become available in the near to medium term. This is driving the customer to consider the extended Ku-band spectrum of 13.75 – 14.0 GHz. Lastly, there is some additional EIRP benefit on the extended band transponders that could prove beneficial to the end customers for the delivery of satellite content to commercial aircraft.

Previous FCC grant of Amazonas 2 (61° west longitude) for the earth to space transmit spectrum of 13.75 – 14.0 GHz was made for Call Sign E050018 and File number SES-MFS-20100430-00497. DENALI requests similar access to the extended Ku-band spectrum from their Brewster, Washington teleport on the 6.1 meter currently licensed under their Call Sign E120043.

Support of access to Amazonas 2¹ per C.F.R. 25.137 included in footnotes.

¹ **File Number:** SAT-PPL-20100506-00093; SAT-APL-20101209-00257 and SAT-PPL-20090806-00081

Added to Permitted List: See SAT-PPL-20100506-00093; SAT-APL-20101209-00257 (Int’l Bur. Sat. Div., Auth. By Grant Stamp w/ Conditions, December 21, 2010. See also SAT-PPL-20090806-00081 (Int’l Bur. Sat. Div., Auth. By Grant Stamp w/ Conditions, October 15, 2009)