## Application to add a new Satellite point of communication

## Exhibit A Narrative

ISAT US, Inc. ("ISAT US") hereby seeks to modify its Global Xpress Ka-band aeronautical blanket earth station license, Call Sign E140114, to add a new point of communication. It is proposed that each of the three currently authorized earth station terminal types would communicate with the Inmarsat 5F1 (I5F1) located at the nominal 63° E.L. orbital location. The current license authorizes ISAT US to communicate with the Inmarsat 5F2 and Inmarsat 5F3 satellite networks, see Call Sign E140114, File No. SES-LIC-20141030-00832 ("GX Aero Application") (as modified by File Nos. SES-MFS-20150923-00605, SES-MOD-20160302-00191, and SES-MOD-20171010-01126). The E140114 license covers operations in the 29.5-30.0 GHz (Earth-to-space) and 19.7-20.2 GHz (space-to-Earth) frequency bands.

The Inmarsat 5F1 satellite is located at 63° E.L. orbital location over the Indian Ocean and has been in operation since 2014. Given its orbital location the I5F1 is not visible, and therefore is not capable of providing service to the US, however the satellite can provide service to US flagged aircraft operating in the coverage area of the I5F1 satellite illustrated below.

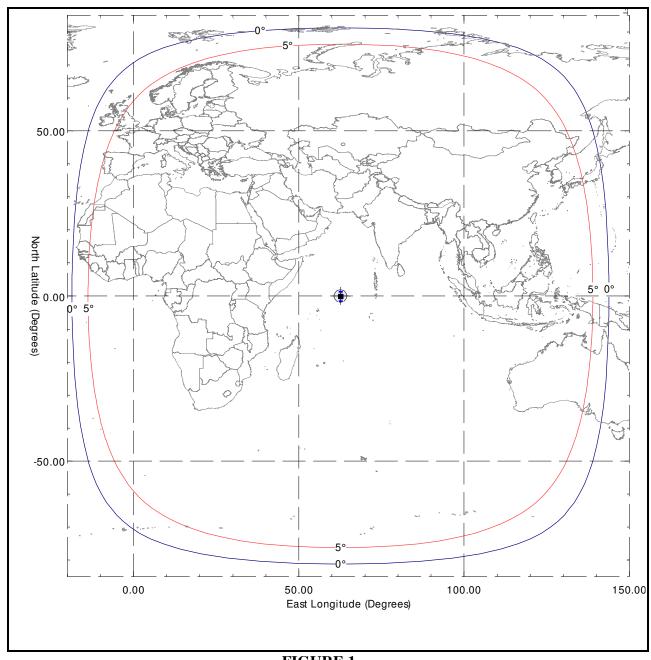


FIGURE 1

Global Xpress I5 F1 Satellite Coverage (5-degree contour in red; 0-degree contour in blue)

The I5F1 satellite is licensed by the United Kingdom<sup>1</sup> under the ITU filing name Inmarsat-Ka 63E. The design of the I5F1 satellite is the same as the Inmarsat 5F2 and 5F3 satellites licensed by the Commission with 89 continuous fixed beams capable of transmitting in the 19.7-20.2 GHz and receiving in the 29.5-30.0 GHz bands. Operations with the I5F1 satellite with already authorized GX terminals on US flagged aircraft will operate consistent with all the parameters, including frequency range, off-axis EIRP levels and polarization, in the E140114 authorization. Furthermore as ISAT US certified in SES-LIC-20141030-00832 operations will be consistent with more stringent parameters if those are required by the foreign administration in their airspace. Inmarsat certifies that the proposed use of the aeronautical earth station terminals at the technical levels specified in the Commission's authorization are consistent with existing coordination agreements with adjacent satellite operators within +/-6 degrees of orbital separation from the Inmarsat 5F1 satellite (see Annex 1). The primary feeder link station for the I5F1 satellite is located in Fucino, Italy with a backup station in Nemea, Greece. The end of life disposal of the I5F1 satellite will be the same as that for the Inmarsat I5F2 and I5F3 satellites licensed by the Commission. No radiation hazard analysis is included since there is no change to the technical and operational parameters for the terminal types included in the E140114 license to communicate with the I5F1 satellite.

The requested modification would allow ISAT US to expand its Ka-band aeronautical service to provide seamless coverage to US flagged aircraft traveling in the I5F1 coverage area. Grant of this application would facilitate the expansion of aeronautical communications to US flagged aircraft through the Global Xpress network to meet the needs to all end users who

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<sup>&</sup>lt;sup>1</sup> The United Kingdom is a member of the World Trade Organization for services covered under the World Trade Organization Basic Telecommunications Agreement.

increasingly demand ubiquitous, high- speed connectivity. Therefore grant of the application is in the public interest.

To the extent necessary, ISAT US seeks a waiver of the U.S. Table of Frequency Allocations in Section 2.106 of the Commission's rules, and the Commission's Ka-band band plan, to operate mobile terminals with an FSS satellite point of communication in frequencies allocated for FSS.

Such a waiver has already been granted for call sign E140114, and ISAT US does not believe a new waiver is needed for a new point of communication, but makes this request out of an abundance of caution.