Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
AC BidCo LLC	)	File No. SES-MOD-_____
	)	Call Sign E120106
Application for Modification of Blanket License for	)	
Operation of Ku-Band Transmit/Receive	)	
Earth Stations Aboard Aircraft	)	

MODIFICATION

AC BidCo LLC ("AC BidCo") hereby seeks modification of its blanket license to operate Ku-band transmit/receive earth stations aboard aircraft ("ESAAs") on domestic and international flights.[1] AC BidCo seeks to add the following satellites as authorized points of communication for ESAA operations:

(1) the U.S.-licensed Intelsat 901 satellite to replace services previously provided by Intelsat 907 at 27.5° W.L.;
(2) the U.S.-licensed Intelsat 32e payload at 43.15° W.L.; and
(3) the U.S.-licensed Intelsat 39 satellite at 61.95° E.L.

A narrative description of the relevant changes is provided here, and AC BidCo is attaching an FCC Form 312 with the updated information. Pursuant to Section 25.117(c) of the Commission's rules, AC BidCo is providing herein information that is changing as a result of the modification. AC BidCo certifies that the remaining information provided in support of the AC BidCo License has not changed.[2]

---

[1] Call Sign E120106, File No. SES-MFS-20191112-01456, granted Apr. 13, 2020 (the "AC BidCo License").

[2] For the Commission's convenience, AC BidCo has attached as Annex 1 hereto a table listing the information required pursuant to Part 25 of the Commission's rules and providing a cross-reference to the necessary information.

I. SATELLITES USED BY THE AC BIDCO ESAA NETWORK

AC BidCo requests addition of the satellites described below as points of communication for the AC BidCo ESAA network pursuant to the provisions of Section 25.228. Each of the requested satellites is eligible for authority for use with the AC BidCo ESAA network. AC BidCo seeks authority for all the requested additional satellites to communicate with both the AeroSat antennas designated as AES1 on the AC BidCo License and the ThinKom model 2Ku antennas designated as AES2 on the license.

Intelsat 901: Intelsat 901 is a U.S.-licensed satellite operating at 27.5° W.L.,[3] and complete technical information regarding the satellite is therefore already on file with the Commission. Intelsat 901 is replacing services previously provided by Intelsat 907 at this location, and AC BidCo requests that the Commission authorize ESAA operations with Intelsat 901 and remove Intelsat 907 from the AC BidCo License. AC BidCo seeks authority to use Intelsat 901 capacity for ESAA operations in the same band segments for which it was permitted to use Intelsat 907: the 14-14.5 GHz uplink spectrum and the 10.95-11.2 GHz and 11.45-11.7 GHz downlink spectrum, consistent with the Intelsat 901 Authorizations and as permitted under the Commission's decision regarding earth stations in motion.[4] Intelsat 901 will provide coverage of the East Pacific region and South America. A letter confirming that

---

[3] *Intelsat License LLC*, Call Sign S2405, File No. SAT-MOD-20190207-00009, granted June 20, 2019 (authorizing the satellite to be redeployed to 27.5° W.L. as a combined vehicle stack with Space Logistics' MEV-1 space station, call sign S2990); File No. SAT-STA-20200310-00025, granted Mar. 27, 2020 (authorizing operations with a revised coverage pattern) (together, the "Intelsat 901 Authorizations"). An application to modify the satellite's license to reflect the updated coverage pattern is pending before the Commission, File No. SAT-MOD-20200402-00030.

[4] *Amendment of Parts 2 and 25 of the Commission's Rules to Facilitate the Use of Earth Stations in Motion Communicating with Geostationary Orbit Space Stations in Frequency Bands Allocated to the Fixed-Satellite Service*, Report and Order and Further Notice of Proposed Rulemaking, 33 FCC Rcd 9327 (2018) ("ESIMs Order").

operation of the AC BidCo ESAA terminals is consistent with coordination agreements with satellites operated within six degrees of Intelsat 901 is included in Annex 3.

Intelsat 32e: Intelsat 32e is a payload on the U.S.-licensed SKY-B1 satellite operating at 43.15° W.L.,[5] and complete technical information regarding the satellite is therefore already on file with the Commission. AC BidCo seeks authority to use Intelsat 32e capacity for ESAA operations in the 14-14.5 GHz uplink spectrum and the 11.7-12.2 GHz downlink spectrum, consistent with the Intelsat 32e License and as permitted under the ESIMs Order. Intelsat 32e will provide coverage of the Eastern United States and the Atlantic Ocean Region. A letter confirming that operation of the AC BidCo ESAA terminals is consistent with coordination agreements with satellites operated within six degrees of Intelsat 32e is included in Annex 3.

Intelsat 39: Intelsat 39 is a U.S.-licensed satellite operating at 61.95° E.L.,[6] and complete technical information regarding the satellite is therefore already on file with the Commission. AC BidCo seeks authority to use Intelsat 39 capacity for ESAA operations in the 14-14.5 GHz uplink spectrum and the 10.7-11.7 GHz and 12.25-12.75 GHz downlink spectrum, consistent with the Intelsat 39 License and as permitted under the ESIMs Order. Intelsat 39 will provide coverage of Asia, Europe, Africa, and the Indian Ocean Region. A letter confirming that operation of the AC BidCo ESAA terminals is consistent with coordination agreements with satellites operated within six degrees of Intelsat 39 is included in Annex 3.

---

[5] *DIRECTV Enterprises, LLC*, Call Sign S2922, File No. SAT-MOD-20170221-00019, granted May 11, 2017 ("Intelsat 32e License").

[6] *Intelsat License LLC*, Call Sign S3023, File No. SAT-MOD-20191024-00119, granted Jan. 16, 2020 ("Intelsat 39 License").

II. WAIVER REQUESTS

AC BidCo requests limited waivers of the Commission's rules in connection with this modification. Specifically, AC BidCo seeks any necessary waivers of the U.S. Table of Allocations in Section 2.106 and footnote NG52 to permit ESAA operations with Intelsat 39 in the 10.7-10.95 GHz, 11.2-11.45 GHz, and 12.25-12.75 GHz spectrum. Grant of these waivers is consistent with Commission policy:

> The Commission may waive a rule for good cause shown. Waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation would better serve the public interest than would strict adherence to the general rule. Generally, the Commission may grant a waiver of its rules in a particular case if the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.[7]

AC BidCo seeks any necessary waiver of footnote NG52 to Section 2.106 to permit ESAA operations in the 10.7-10.95 GHz and 11.2-11.45 GHz spectrum on an unprotected, non-interference basis outside the U.S. Footnote NG52 specifies that except as provided in footnote NG527A, use of the 10.7-11.7 GHz band by the fixed-satellite service is limited to international operations. Footnote NG527A states that ESIMs operations in the 10.95-11.2 GHz and 11.45-11.7 GHz bands are permitted on an unprotected basis with respect to fixed service operations, but that express carve-out does not extend to the 10.7-10.95 GHz or 11.2-11.45 GHz band segments. The Commission has, however, authorized AC BidCo and others to provide ESAA operations in these portions of the extended Ku-band.[8]

AC BidCo also requests any necessary waiver of the Table of Allocations in Section 2.106 of the Commission's rules to permit use of downlink spectrum in the 12.25-

---

7 *PanAmSat Licensee Corp*., 17 FCC Rcd 10483, 10492 (Sat. Div. 2002) (footnotes omitted).

8 *See, e.g.*, AC BidCo License, Section B (authorizing use of the 10.7-12.75 GHz band).

12.75 GHz band range for ESAA operations. The Commission has expressly recognized that "terminals on U.S.-registered aircraft may need to access foreign satellites while traveling outside of the United States (*e.g.*, over international waters), and therefore may need to downlink in the extended Ku-band in certain circumstances."[9] To meet this need, AC BidCo and other ESAA providers have requested and received Commission authority to receive signals in the 12.2-12.75 GHz band.[10]

The same rationale supports grant of any necessary waiver to permit AC BidCo to receive transmissions from Intelsat 39 in the 10.7-10.95 GHz, 11.2-11.45 GHz, and 12.25-12.75 GHz spectrum. AC BidCo does not propose to use the Intelsat 39 satellite in U.S. airspace, and AC BidCo's proposed operations in this spectrum are consistent with coordination agreements with operators of adjacent satellites within six degrees of Intelsat 39. Authorizing AC BidCo to receive signals from Intelsat 39 will not alter the technical characteristics of the satellite's operations in any way, and therefore will not create harmful interference to other authorized users of the spectrum. Furthermore, AC BidCo will not claim interference protection from such authorized users. Under these circumstances, grant of any required Commission waivers is justified to permit use of frequencies in the 10.7-10.95 GHz, 11.2-11.45 GHz, and 12.25-12.75 GHz band for downlinks from Intelsat 39 as part of the AC BidCo ESAA network.

---

9 *Service Rules and Procedures to Govern the Use of Aeronautical Mobile Satellite Service Earth Stations in Frequency Bands Allocated to the Fixed Satellite Service,* Notice of Proposed Rulemaking, 20 FCC Rcd 2906 (2005) at ¶ 18 (footnote omitted).

10 *See, e.g.*, AC BidCo License, Section B (authorizing reception of transmissions in the 12.2-12.75 GHz band); *Panasonic Avionics Corporation*, File No. SES-MFS-20180122-00052, Call Sign E100089, granted Aug. 1, 2018, Section B.

III. CONCLUSION

AC BidCo respectfully requests that the Commission modify the AC BidCo License to reflect the changes described herein.

Respectfully submitted,

AC BIDCO LLC

By: */s/ Marguerite Elias*

Marguerite Elias
Executive Vice President & General Counsel
AC BidCo LLC
111 North Canal Street
Chicago, IL 60606
(202) 870-7220

Of Counsel
Karis A. Hastings
SatCom Law LLC
1317 F Street, N.W., Suite 400
Washington, D.C. 20004
(202) 599-0975

Dated: May 1, 2020

ANNEX 1: Table of Information Required by Commission Rules

Regulatory Requirement	Citation to Information Provided
25.115(m)(2), 25.228(a)	Target satellite operator certifications pursuant to Section 25.220 are in Annex 3 attached.
25.115(m)(3)(i), 25.228(b) & (c)	AC BidCo has previously demonstrated that its system will comply with coordination agreements and requirements to cease transmissions if applicable limits are exceeded.
25.115(m)(3)(ii)	The ESAA network will operate in U.S. airspace, foreign airspace, and in the airspace over international waters. Coverage areas for the specific satellites to be used in the ESAA network are described in the table found in Annex 2 attached.
25.115(m)(3)(iii), 25.228(g)(1)	The 24/7 point of contact information remains the same. The phone number is +1 866-943-4662 and the e-mail address is noc@gogoair.com. The street address is: AC BidCo Network Operations Center, 111 North Canal Street, Chicago, IL, 60606, as specified in Form 312 Schedule B, Items E2-E9.
25.115(m)(3)(iv)	No change to previously filed Radiation Hazard analyses.
25.228(j)(1)	AC BidCo's coordination agreement with NASA was filed February 1, 2013 in File Nos. SES-LIC-20120619-00574 *et al*.
25.228(j)(3)	AC BidCo's coordination agreement with NSF was included as Amendment Exhibit B in File No. SES-AMD-20120731-00709.

ANNEX 2:
Updated Spacecraft and Teleport Tables

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Use in US airspace?	Satellite Operator
AMC-1[1]	130.9W	North America, Pacific Ocean	14-14.5	11.7-12.2	Yes	SES
AMC-4[2]	134.9W	North America, Pacific Ocean	14-14.5	11.45-11.7; 11.7-12.2	Yes	
AMC-6	83W	North America	14-14.5	11.45-11.7; 11.7-12.2	Yes	
AMC-21	124.9W	United States	14-14.5	11.7-12.2	Yes	
ASTRA 4A	4.8E	Europe	14-14.25	11.7-12.2; 12.2-12.75	No	
SES-1	101W	North America	14-14.5	11.7–12.2	Yes	
SES-3	103W	North America	14-14.5	11.7-12.2	Yes	
SES-4	22W	Europe	14-14.5	12.5-12.75	No	
SES-6	40.5W	East Atlantic Ocean	14-14.5	10.95-11.2; 11.45-11.7	No	
		West Atlantic Ocean	14-14.5	10.95-11.2; 11.45-11.7	Yes	
SES-10	67W	North and Central America, the Gulf of Mexico, and the Caribbean	14-14.5	10.95-11.2; 11.45-11.7; 11.7-12.2	Yes	
SES-14	47.5W	North America	14-14.5	10.95-11.2; 11.45-11.7; 11.7-12.2	Yes	
SES-15	129.15W	North America, Pacific Ocean	14-14.5	10.7-11.7 11.7-12.2	Yes	

[1] This satellite is only used for communications with the Aerosat antenna system, designated AES1.

[2] This satellite is only used for communications with the ThinKom 2Ku antenna system, designated AES2.

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Use in US airspace?	Satellite Operator
Galaxy 17	91W	North America	14-14.5	11.7-12.2	Yes	Intelsat
Galaxy 28	89W	Brazil	14-14.5	11.7-12.2	No	
IS-14	45W	North and South America excludes Brazil	14-14.5	11.7–12.2	Yes	
IS-18	180E	South Pacific	14-14.5	12.25-12.75	No	
IS-19	166E	Northeast Pacific	14-14.5	12.25-12.75	Yes	
		Northwest Pacific	14-14.5	12.25-12.75	No	
		Australia				
		Southwest Pacific				
IS-20	68.5E	Middle East	14-14.5	10.95-11.2; 11.45-11.7; 12.5-12.75	No	
IS-21	58W	Brazil	14-14.5	11.7–12.2	No	
		South Atlantic Ocean	14-14.5	11.45–11.7	No	
IS-22	72.1E	Mobility from Mideast to Japan and to Australia	14-14.5	12.25–12.5	No	
IS-29e	50W	United States	14-14.5	10.95-11.7; 11.7-12.2	Yes	
IS-32e	43.15W	Eastern United States and Atlantic Ocean Region	14-14.5	11.7-12.2	Yes	
IS-33e	60E	Africa, Asia, and Europe	14-14.5	10.95-11.2; 11.45-11.7; 11.7-12.2; 12.5-12.6	No	
IS-37e	18W	Europe	14-14.5	10.95-11.7; 12.5-12.75	No	
IS-39	62E	Asia, Europe, Africa, Indian Ocean Region	14-14.5	10.7-11.7; 12.25-12.75	No	
IS-901	27.5W	East Pacific and South America	14-14.5	10.95–11.2; 11.45-11.7	Yes	
IS-904	60E	Spot 1 - Western Russia	14-14.5	10.95–11.2; 11.45-11.7	No	
Horizons 3e	169E	Asia Pacific	14-14.5	10.95-11.7; 12.2-12.75	Yes	

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Use in US airspace?	Satellite Operator
Eutelsat 115WB	114.9W	North America	14-14.5	11.7-12.2	Yes	Eutelsat
Eutelsat 117WA	116.8W	Central and South America	14-14.5	11.7-12.2	Yes	
E172B[1]	172E	North Pacific and Northeastern Russia	14-14.5	10.95-11.2; 11.45-11.7; 12.2-12.75	No	
Anik F1R	107.3W	North America	14-14.5	11.7-12.2	Yes	Telesat
T-11N	37.5W	Africa	14-14.5	10.95-11.2; 11.45-11.7; 12.5-12.75	No	
		Atlantic	14-14.5	11.45-11.7	No	
Telstar 12V	15W	Brazil	14-14.5	11.7-12.2	No	
Telstar 18/ Apstar 5	138E	Asia	14-14.5	12.2–12.75	No	
Telstar 18V	138E	Australia, New Zealand, Indonesia, and Malaysia	14-14.5	11.45-11.7	No	
JCSAT-2B	154E	South Pacific	14-14.5	11.45-11.7; 12.25-12.75	Yes	JSAT
JCSAT-3A	128E	Japan	14-14.5	12.2-12.75	No	
JCSAT-5A[1]	132E	Japan	14-14.5	12.25-12.75	No	
JCSAT-110A[2]	110E	Indian Ocean	14-14.5	12.2-12.75	No	

[1] These satellites are only used for communications with the Aerosat antenna system, designated AES1.

[2] This satellite is only used for communications with the ThinKom 2Ku antenna system, designated AES2.

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Use in US airspace?	Satellite Operator
Yamal 300K	177W	North Pacific Ocean	14-14.5	10.95-11.2; 11.45-11.7; 12.5-12.75	Yes	Gazprom Space Systems
Yamal 401	90E	Russia	14-14.5	10.95-11.2; 11.45-11.7; 12.5-12.75	No	
AsiaSat 7	105.5E	China	14-14.5	12.25-12.75	No	AsiaSat
AsiaSat 9	122E	China	14-14.5	10.95-12.75	No	
ARSAT-2	81W	North America	14-14.5	11.7-12.2	Yes	Empresa Argentina de Soluciones Satelitales S.A.
Optus D2	152E	Australia	14-14.5	12.25-12.75	No	Optus
ABS-3A	3W	North and South America	14-14.25	10.95-11.2	Yes	ABS Global
APSTAR-6C	134E	Asia	14-14.5	12.25-12.75	No	APT Mobile Satcom Limited
Amazonas-2	61W	North America	14-14.5	10.95-11.2 11.7-12.2	Yes	Hispamar Satellite S.A.

Satellite	Teleport Location	FCC Call Sign
AMC-1	Woodbine, MD	E900448
AMC-4	Brewster, WA	E120043
AMC-6	Perris, CA	E940448
AMC-21	Woodbine, MD	E900448
ASTRA 4A	Betzdorf, Luxembourg	N/A
SES-1	Woodbine, MD	E920698
SES-3	Woodbine, MD	E140059
SES-4	Bristow, VA	E020071
	Bristow, VA	E000696
SES-6	Betzdorf, Luxembourg	N/A
SES-10	Perris, CA	E940448
SES-14	Woodbine, MD Port St. Lucie, FL	E170197 E170198
SES-15	Woodbine, MD South Mountain, CA	E170138 E170139
Galaxy 17	Atlanta, GA ATL-K26	E990214
Galaxy 28	Rio de Janeiro, Brazil	N/A
IS-14	ATL teleport ATL-C06	E940333
	ATL teleport ATL-K15	E090093
IS-18	Napa teleport NAP-K22	E990224
IS-19	Perth, Australia	N/A
	Napa teleport NAP-K31	E980460
	Napa teleport NAP-C30	E980467
IS-20	Fuchsstadt, Germany	N/A
IS-21	Rio de Janeiro, Brazil	N/A
	Mobility: MTN teleport MTN-K02	E030051
IS-22	Kumsan, Korea	N/A
IS-29e	Hagerstown, MD	E030103
IS-32e	Hagerstown, MD	E170081
IS-33e	Fuchsstadt, Germany	N/A
	Moscow, Russia	N/A
IS-37e	Hagerstown, MD	E040414
IS-39	Fuchsstadt, Germany	N/A
IS-901	Hagerstown, MD	E030103
IS-904	Moscow, Russia	N/A
Horizons 3e	Napa teleport NAP-C21	E950307

Satellite	Teleport Location	FCC Call Sign
Eutelsat 115WB	Brewster, WA	E120043
Eutelsat 117WA	Brewster, WA	E060416
E172B	Khabarovsk, Russia	N/A
Anik F1R	Brewster, WA	E960222
T-11N	Aflenz, Austria	N/A
Telstar 12V	Rio de Janeiro, Brazil	N/A
Telstar 18/Apstar 5	China	N/A
Telstar 18V	Sydney, Australia	N/A
JCSAT-2B	Kapolei, HI	E010236
JCSAT-3A	Yokohama, Japan	N/A
JCSAT-5A	Yokohama, Japan	N/A
JCSAT-110A	Perth, Australia	N/A
Yamal 300K	Brewster, WA BRW-05C	E120043
Yamal 401	Moscow, Russia	N/A
AsiaSat-7	Beijing, China	N/A
AsiaSat-9	Beijing, China	N/A
ARSAT-2	Brewster, WA	E120043
Optus D2	Belrose, Australia	N/A
ABS-3A	Macae, Brazil	N/A
APSTAR 6C	Beijing, China	N/A
Amazonas-2	Brewster, WA	E891020

ANNEX 3: Satellite Company Letters

April 17th, 2020
Federal Communications Commission
International Bureau
445 12th Street, SW
Washington, DC 20554

Re: Coordination Certificate for AC BidCo LLC Earth Stations Aboard Aircraft Application

To whom it may concern

This letter certifies that Intelsat Corporation is aware that AC BidCo LLC ("AC BidCo") is planning to seek modification of its authorization from the Federal Communications Commission ("FCC") to operate Ku band transmit/receive Earth Stations Aboard Aircraft ("ESAA") terminals AES 1 and AES2 (Call Sign E1201 06). The AC BidCo application will seek authority for these ESAA terminals to communicate with IS-901 at 332.5°E under the current ESAA rules, including Section 25.228.

Intelsat Corporation certifies that AC BidCo's use of the ESAA transmit/receive terminals AES 1 and AES2, installed and operated in accordance with the AC BidCo application and the above conditions is consistent with existing coordination agreements with all adjacent satellite operators within +/-6 degrees of orbital separation from IS-901 at 332.5°E and will be operated in conformance with existing coordination agreements with other satellite systems.

If the FCC authorizes the operations proposed by AC BidCo in its application, Intelsat Corporation will include the power density levels used by AC BidCo in all future satellite network coordination.

Yours sincerely,

Giselle Creeser
Director, Spectrum Strategy & Engineering

INTELSAT
7900 Tysons One Place | McLean, VA 22102
+1 703-559-7851 | M +1 703-883-7444
giselle.creeser@intelsat.com

Intelsat US LLC
7900 Tysons One Place, McLean, VA 22102-5972 USA www.intelsat.com T +1 703-559-6800

28 April 2020

Federal Communications Commission
International Bureau
445 12th Street, SW
Washington, DC 20554

Re: Coordination Certificate for AC BidCo LLC Earth Stations Aboard Aircraft Application

To Whom it May Concern:

DIRECTV Enterprises LLC ("DIRECTV") a wholly-owned subsidiary of AT&T, Inc. ("AT&T") is the FCC licensee for the SKY-B1 satellite at the 43.15°W orbital location. Intelsat US LLC ("Intelsat") operates a payload on the SKY-B1 satellite that is referred to as IS-32e. By agreement of DIRECTV and Intelsat, Intelsat is solely responsible for coordination and operation of the IS-32e and SKY-B1 payloads.

Both DIRECTV and Intelsat are aware that AC BidCo LLC ("AC BidCo") is planning to seek modification of its Federal Communications Commission authorization (Call Sign E120106) to operate Ku-band transmit/receive Earth Stations Aboard Aircraft ("ESAA") terminals AES 1 and AES 2 with the IS-32e payload of the SKY-B1 satellite at 43.15°W under the current ESAA rules, including Section 25.228 and 25.220.

Intelsat certifies that AC BidCo's use of the ESAA transmit/receive terminals AES 1 and AES 2, installed and operated in accordance with the AC BidCo application, is consistent with existing coordination agreements with all adjacent satellite operators within +/-6 degrees of orbital separation from the IS-32e payload at 43.15°W and will be operated in conformance with such existing coordination agreements.

If the FCC authorizes the operations proposed by AC BidCo in its application, Intelsat will include the power density levels used by AC BidCo in all relevant future satellite network coordination agreements.

Yours sincerely,

/s/ Giselle G. Creeser

Giselle G. Creeser
Director, Spectrum Strategy & Engineering
Intelsat US LLC

/s/ Jessica B. Lyons

Jessica B. Lyons
Assistant Vice President -Senior Legal Counsel
AT&T

INTELSAT
Envision. Connect. Transform.

December 10th, 2019

Federal Communications Commission
International Bureau
445 12th Street, SW
Washington, DC 20554

Re: Engineering Certification of Intelsat Corporation

To whom it may concern,

This letter certifies that Intelsat Corporation is aware that AC BidCo LLC ("AC BidCo") is planning to seek modification of its authorization from the Federal Communications Commission ("FCC") to operate Ku band transmit/receive Earth Stations Aboard Aircraft ("ESAA") terminals AES1 and AES2 (Call Sign E120106). The AC BidCo application will seek authority for these ESAA terminals to communicate with IS-39 at 62° E.L. under the current ESAA rules, including Section 25.228.

Intelsat Corporation certifies that AC BidCo's use of the ESAA transmit/receive terminals AES1 and AES2, installed and operated in accordance with the AC BidCo application and the above conditions, is consistent with existing coordination agreements with all adjacent satellite operators within +/-6 degrees of orbital separation from IS-39 and will be operated in conformance with existing coordination agreements with other satellite systems.

If the FCC authorizes the operations proposed by AC BidCo in its application, Intelsat Corporation will include the power density levels used by AC BidCo in all future satellite network coordination agreements with other adjacent satellite operators.

Sincerely,

Giselle Creeser
Director, Spectrum Policy & Engineering
INTELSAT
O: +1 (703) 559-7851
M: +1 (703) 883-7444
giselle.creeser@intelsat.com