



LMI Advisors, LLC
2550 M Street, NW
Suite 300 Washington, D.C.
20037

Carlos M. Nalda
T +1 571 332 5626
cnalda@lmiadvisors.com

April 20, 2021

Marlene H. Dortch
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: Section 1.65 Submission of Panasonic Avionics Corporation,
File Nos. SES-MFS-20200513-00528, Call Sign E100089**

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Federal Communications Commission's ("Commission") Rules, 47 C.F.R. § 1.65, Panasonic Avionics Corporation ("Panasonic") hereby clarifies certain information in the above-referenced application to modify its earth station aboard aircraft ("ESAA")/earth station in motion ("ESIM") blanket license.

Panasonic has requested that the Commission permit ESAA/ESIM operations with the Telstar 19V, Horizon 3e, and GSAT-14 satellites in the 12.2-2.7 GHz band. Although the beam plots included in the application suggest some coverage of U.S. territory, Panasonic has requested authority to conduct such operations *only outside the United States* on a non-conforming, non-interference basis consistent with Commission practice of permitting such operations because they present a negligible risk of interference to other spectrum users. For the avoidance of doubt, Panasonic does not seek authority to operate in the 12.2-12.7 GHz band within the United States. Thus, there is no potential for interference from Panasonic's non-U.S., receive-only operations to U.S. licensees operating in the band.

Please do not hesitate to contact me with any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Carlos M. Nalda".

Carlos M. Nalda
for Panasonic Avionics Corporation

cc: Paul Blais
Anthony Asongwed
Cindy Spiers