



**LMI Advisors, LLC**  
2550 M Street, NW, Suite 300  
Washington, DC 20037

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

June 29, 2021

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

**Re: GEE Licensing Holdings LLC – Application for Modification of License,  
File No. SES-MFS-20210127-00153 (Call Sign E080100)**

Dear Ms. Dortch:

On behalf of Eutelsat, S.A. (“Eutelsat”), we hereby confirm support for grant of the above-referenced GEE Licensing Holdings LLC (“GEE”) modification application. Eutelsat sees no reason that GEE should not be authorized to use the bands it has requested to communicate with the EUTELSAT 139 West A satellite, including the entire 12.5-12.75 GHz downlink band.<sup>1</sup> It is expected that GEE will be subject to the same condition that applies to Eutelsat’s authorization in this band, which requires operation on a non-protected, non-harmful-interference basis.

As Eutelsat explained in its own request for waiver of Section 2.106 of the Commission’s Rules, the EUTELSAT 139 West A “is located more than 10° away from the closest BSS satellite serving the U.S. market and the satellite operates at downlink PFDs that are no greater than those permitted for FSS services in Regions 1 and 3.”<sup>2</sup> Accordingly, there will be no interference to authorized users in the 12.5-12.7 GHz band. Neither DISH Network nor RS Access, the Petitioners opposing GEE’s application, has made any showing that GEE’s operations would cause any interference to their authorized operations.

The Petitioners’ arguments provide no public interest basis for the denial of GEE’s request to access the downlink band on the same limited basis under which Eutelsat is authorized to transmit in the band. The Petitioners raise objections to this use are of the type appropriate to a rulemaking proceeding, as if GEE were seeking long-term *protected* access to the band. But that is not the case here.

---

<sup>1</sup> DISH Network and RS Access (“Petitioners”) have challenged GEE’s proposed use of the 12.2-12.7 GHz band. *See* Dish Network Corp., Petition to Deny In Part, File No. SES-MFS-20210127-00153 (filed May 7, 2021); *see also* RS Access, LLC, Petition to Deny In Part, File No. SES-MFS-20210127-00153 (filed May 7, 2021).


<sup>2</sup> Eutelsat, S.A., Petition for Declaratory Ruling, File No. SAT-PDR-20191017-00115, Call Sign S3055, Narrative at 9.

GEE seeks only the opportunity to make current use of available capacity to provide service on a non-protected basis to ensure the availability of high-quality, in-flight connectivity services in the Western United States. Indeed, Eutelsat understands that earth stations aboard aircraft (“ESAAs”)/earth stations in motions (“ESIMs”) in this band are not entitled to protection while they are in-motion.

In view of the foregoing, the public interest would be served by grant of the GEE modification application at the earliest practical time.

Please do not hesitate to follow up with any questions regarding this submission.

Respectfully submitted,



Carlos M. Nalda  
Jonathan B. Bair

*for Eutelsat S.A.*

## CERTIFICATE OF SERVICE

I, Jennifer White, do hereby certify that on June 29, 2021, a true and correct copy of the foregoing Letter of Support was served via First Class mail on the following:

Julia Waldron  
GLOBAL EAGLE  
1821 E. Dyer Road, Suite 125  
Santa Ana, CA 92705

David S. Keir  
LERMAN SENTER PLLC  
2001 L Street, NW, Suite 400  
Washington, DC 20036  
*Counsel for Global Eagle*

Jeff Blum  
Alison Minea  
Hadass Kogan  
DISH NETWORK CORPORATION  
1110 Vermont Avenue, NW, Suite 750  
Washington, DC 20005

Pantelis Michalopoulos  
Matthew R. Friedman  
STEPTOE & JOHNSON LLP  
1330 Connecticut Avenue, NW  
Washington, DC 20036

V. Noah Campbell  
RS ACCESS, LLC  
645 5th Ave, 10th Floor  
New York, NY 10022



Jennifer White  
LMI Advisors, LLC