ATTACHMENT

Description of Application for Modification of License

1.0 OVERVIEW

Global Eagle Telecom Licensing Subsidiary, LLC, Debtor-in-Possession ("Global Eagle")[1] seeks modification of its Ku-band Earth Stations Aboard Aircraft ("ESAA") license (Call Sign E080100) for the purpose of adding four additional satellite points of communication, which are listed below –

- Telesat Anik-F1R ("Anik-F1R") (Call Sign S2674, FCC File No. SAT-PPL-20050504-00094), which is located at 107.3° West Longitude
- Telesat Anik-F1 ("Anik-F1") (Originally authorized under Call Sign S2745), to be re-located to 109.2° West Longitude[2]
- Eutelsat 139 West A ("E139 WA") (Call Sign S3055, FCC File No. SAT-PDR-20191017-00115), which is located at 139.2°West Longitude
- Hispasat 143 W-1 ("H143 W-1") (Call Sign S3058, FCC File No. SAT-PDR-20191205-00143), located at 143° West Longitude

Global Eagle seeks this modification subject to all terms and conditions set forth in its current license[3] and the operations proposed are otherwise consistent with the technical specifications set forth in its license. Operations using the additional satellites would use both the TECOM Ku-Stream (SAA/Remote 2) and QEST Q050000 (GSAA/Remote 3) antennas. The Form 312, Schedule B associated with this filing reflects only the additional points of communication and additional receive frequencies for the satellites listed above and does not recapitulate all of the technical data contained in its current license. All existing information contained in the current license should be carried forward to the license as modified.

2.0 ADDITIONAL POINTS OF COMMUNICATION REQUESTED

Global Eagle requests the addition of the satellites listed above and in the Form 312, Schedule B to provide expanded coverage of the geographic locations described below and to replace currently authorized capacity on satellites that have been decommissioned, including Telesat 12 at the nominal 109 W.L. orbital location. Complete technical information regarding each satellite was submitted to

[1] Global Eagle is currently party to a license assignment application including this ESAA license under which it seeks FCC approval to assign the license to GEE Licensing Holdings LLC. *See* FCC File No. SES-ASG-20201022-01156.

[2] This satellite was previously operated at the 107.3° W.L. under Call Sign S2745 but was not providing any service to U.S. locations. Under a recently filed market access request, Telesat has requested U.S. authority to locate the satellite at 109.2° W.L. for provision of service to the southern United States and the Caribbean. *See* FCC File No. SAT-PPL-20210108-00005.

[3] *See* Global Eagle, Call Sign E080100, FCC File Nos. SES-MFS-20190312-00328 and SES-AFS-20190719-00929 (granted 1/22/2020).

the FCC in the proceedings authorizing their inclusion on the Ku-band Permitted List, which are referenced in the foregoing paragraph. Global Eagle therefore simply requests that its existing ESAA license be updated to reflect use of Anik-F1, Anik F1R, E139 WA and H143 W-1 on a primary basis for ESAA transmit operations in the 14-14.5 GHz band. It also seeks authority for Anik-F1, Anik F1R, and H143 W-1 to operate on a primary basis in the 11.7-12.2 GHz downlink band. In addition, Global Eagle seeks permission to utilize the extended C-band downlink frequencies at 10.95-11.2 GHz, 11.45-11.7 GHz and 12.5-12.75 GHz on the E139 WA satellite and the 11.45-11.7 GHz, 12.2-12.5 GHz and 12.5-12.75 GHz downlink frequency bands on the H143 W-1. The proposed uses of the 12.2-12.5 GHz and 12.5-12.75 GHz bands are consistent with the authority granted to Eutelsat and Hispasat in their market access authorization.

The addition to the Global Eagle license of authority to communicate using these satellites will provide additional near-term space segment capacity for Global Eagle's ESAA network, thereby allowing it to provide continued and expanded throughput and coverage for the provision of its in-flight Wi-Fi connectivity services to airline passengers on flights operating throughout the contiguous United States, in the Caribbean and between CONUS and Hawaii. This capacity is immediately available for use, and Global Eagle therefore seeks modification of its authority as quickly as possible.

3.0 COORDINATION CERTIFICATIONS [47 C.F.R. §§ 25.228(a) & 25.220(d)]

Global Eagle's intended operations are within the scope of use that Eutelsat, Hispasat/Intelsat and Telesat have coordinated with the adjacent satellite operators within six degrees adjacent to each satellite in either direction along the geostationary arc and should not cause harmful interference to any of these satellites operating in accordance with FCC's two-degree spacing policy. Exhibit A attached hereto provides copies of the coordination certification letters signed by each operator covering Global Eagle's proposed operations using each of the four satellites

In the event that a new Ku-band NGSO FSS system is launched in the future, Global Eagle would enter into coordination with the NGSO FSS system operator to establish operating parameters that permit successful co-frequency sharing and would modify its operations as necessary to implement any coordination agreement reached. Global Eagle acknowledges that the Commission may condition the grant of any modified license issued to it upon a requirement that it complete such coordination at the appropriate time.

4.0 TECHNICAL DATA AND PREDICTED COVERAGE AREAS [47 C.F.R. § 25.227(b)(4)]

Exhibit B attached hereto includes illustrations detailing the geographic coverage contours for operations using each satellite.

5.0 REVISED SPACECRAFT, FREQUENCY & BEAM COVERAGE

Table 1a: Spacecraft, Frequency & Beam Coverage Table
(U.S. Licensed Satellites)

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Satellite Operator
AMC-1	130.9 W	North America, Central America and Pacific	14.05-14.47	11.7-12.2	**SES**
AMC-2	84.85 W	North America, Caribbean and North Atlantic	14.05-14.47	11.7-12.2	
AMC-3	72.0 W	North America, Central America, Atlantic and Caribbean	14.05-14.47	11.7-12.2	
AMC-9	83.0 W	North America, Caribbean, Central America and North Atlantic	14.05-14.47	11.7-12.2	
SES-1	101.0 W	North America, Central America, Pacific and Caribbean	14.05-14.47	11.7–12.2	
SES-10	67.0W	North America, Central America, South Atlantic and Caribbean	14.05-14.47	11.7-12.2	
SES-15	129.0 W	North America, Central America, Caribbean and Pacific	14.05-14.47	10.7-10.95, 10.95-11.2, 11.2-11.45, 11.45-11.7, 11.7-12.2	

Table 1b: Spacecraft, Frequency & Beam Coverage Table
(Non-U.S., Permitted List Satellite)

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Satellite Operator
Anik-F1R	107.3 W	North America, Gulf of Mexico and Caribbean	14.05-14.47	11.7-12.2	**Telesat**
Anik-F1	109.2 W	North America, Gulf of Mexico and Caribbean	14.05-14.47	11.7-12.2	
Eutelsat 115 WB	114.9 W	North America, North Atlantic and Pacific Ocean	14.05-14.47	11.7-12.2	**Eutelsat**
Eutelsat 133 WA	132.85 W	North America and Pacific Ocean	14.05-14.47	11.2-11.45, 11.45-11.7, 12.5-12.75	
Eutelsat 139 WA	139 W	North America and Pacific Ocean	14.05-14.47	10.95-11.2, 11.45-11.7, 12.5-12.75	
Hispasat 143 W-1	143 W	North America and Pacific Ocean	14.05-14.47	11.45-11.7, 11.7-12.2, 12.2-12.5, 12.5-12.75	**Intelsat**

= Points of Communication Added in this Application

6.0 TELEPORT UPLINK LOCATIONS

Table 2: Teleport Locations for Provision of Service within the United States

Satellite	Orbital Location	Teleport Location(s)	Site Operator	Call Sign(s)
AMC-1	130.9 W	Holmdel, NJ	Global Eagle	E160163
AMC-2	80.85W	N. Las Vegas, NV	Hughes	E940460
AMC-3	72.0 W	Holmdel, NJ	Global Eagle	E160163
AMC-9	83.0W	North Las Vegas, NV	Hughes	E940460
SES-1	101.0W	North Las Vegas, NV	Hughes	E940460
SES-10	67.0W	Steele Valley, CA	Level 3/ Vyvx	E950202
SES-15	129.0 W	South Mountain, CA	SES	E170139
Anik-F1R	107.3 W	Holmdel, NJ	Global Eagle	E070218
Anik-F1	109.2W	Atlanta. GA	CenturyLink Lumen	E850041
Eutelsat 115 WB*	114.9W	Southfield (Detroit), MI	Hughes	E990170
Eutelsat 133 WA*	132.85 W	Kapolei, HI	Hawaii Pacific Teleport	E010236
Eutelsat 139 WA*	139 W	Jordan, UT	LBiSat	E030342
Hispasat 143 W-1*	143 W	Nuevo, CA Jordan, UT	Intelsat LBiSat	E020126 E030342

* = Non-U.S.-licensed satellite included on Ku-band Permitted List

7.0 LICENSEE CERTIFICATION

I, Simon McLellan, Chief Engineer of Global Eagle Entertainment, Inc., Debtor-in-Possession ("Global Eagle"), hereby certify that Global Eagle:

(1) will continue to comply with the requirements of Section 25.228 of the Commission's Rules and the conditions of its existing license; and

(2) has confirmed, as shown by the four coordination certification letters submitted with this application, that the ESAA operations proposed herein are within coordinated parameters for adjacent satellites up to 6 degrees away on the geostationary arc from each new satellite requested.

Simon McLellan
Chief Engineer
Global Eagle

January 27, 2021