

EXHIBIT 1 – APPLICATION NARRATIVE

COMSAT, Inc.

Request for Modification of KA31 License to
Authorize Santa Paula 12.8 Meter Philco-Ford Teleport Hub Antenna to
Communicate With the United Kingdom Licensed
Inmarsat Carabiner Satellite Constellation and to
Authorize New Emission Designators for Same

File Number SES-RWL-20210520-00825
Call Sign KA31

COMSAT, Inc. (“COMSAT”) respectfully requests that its KA31 license be modified to add Point of Communication (“POC”) authorization for the Santa Paula, CA 12.8 Meter Philco-Ford Teleport Hub Antenna (“KA31 12.8M”) to communicate with the Inmarsat Carabiner Satellite Constellation (“CARABINER”) which is licensed by the United Kingdom. CARABINER is currently made up of three Inmarsat 3 satellites – I3F1, I3F2 and I3F3. The Inmarsat 3 satellites were previously authorized as geosynchronous orbit space stations, but Inmarsat advised that they have now placed them in a controlled westerly drift in a super synchronous orbit as specified in the CARABINER filings¹ submitted to the ITU by the UK administration.

Inmarsat has contracted with COMSAT to provide the ground/satellite link to communicate with CARABINER using L-band and C-band frequencies during that part of the drift arc in which the satellites can be seen from COMSAT’s Santa Paula teleport. This KA31 12.8M antenna is to be used as the back-up antenna to service these satellites. The primary antenna used for servicing these antennas is COMSAT’s KB34 12.8M antenna for which permanent POC authority to operate with CARABINER was recently granted by the Commission in file number SES-MFS-20211108-01799.

The KA31 12.8M antenna is essentially identical to the KB34 12.8M antenna and as with the KB34 12.8M, the KA31 12.8M antenna is currently authorized by its license to communicate in the L-band and C-band with ISAT list satellites generally as well as specifically named Inmarsat satellites within the view of SAPA. The antenna has been successfully coordinated for C-band and L-band across its entire satellite arc (48.0 W.L. – 190.0 W.L.) and the power levels and other particulars for which POC authorization is being requested are well within the levels authorized by the license.

¹ Inmarsat advises that the API and CR/C filings may be found utilizing the following public links:

<https://www.itu.int/ITU-R/space/asreceived/Publication/DisplayPublication/13073>
<https://www.itu.int/ITU-R/space/asreceived/Publication/DisplayPublication/13074>
<https://www.itu.int/ITU-R/space/asreceived/Publication/DisplayPublication/26282>
<https://www.itu.int/ITU-R/space/asreceived/Publication/DisplayPublication/26502>

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Inmarsat advises that they have notified other operators of the ongoing drifts and that transmissions will only be utilized for testing and telemetry, telecommand, and control operations. Inmarsat further advises that they observe a one degree command hinder silence to affected satellites and will endeavor to notify and coordinate if any commanding or ranging is needed within this one degree window.

Compliance With Section 25.137 of the Commission's Rules for Authority for an Earth Station to Communicate With a Non-U.S. Licensed Space Station

Compliance with Section 25.137 was previously established for the 3F3 satellite per Call Sign E000284, File Nos. SES-LIC-20070416-00479 and SES-AMD-20070920-01300. Inmarsat advises that 3F1 and 3F2 are essentially identical to 3F3 in design and operation. COMSAT therefore hereby incorporates by reference the documents and exhibits submitted in those filings to show compliance with Section 25.137 for all three CARABINER satellites. COMSAT notes that this compliance is only asserted for purposes of POC authority. As noted above, Inmarsat has advised that the communications by the COMSAT 12.8M antenna are to be used for testing and telemetry, telecommand, and control operations and that it does not desire U.S. market access for the satellites.

Only the new POC authority and emission designators to be used for same are being requested in this application. No other additions or changes to the license are being requested. As noted above, this KA31 12.8M antenna is to be the back-up antenna for servicing CARABINER and permanent POC authority for the KB34 primary antenna used to communicate with CARABINER for this service was recently granted by the Commission in file number SES-MFS-20211108-01799. As also noted above, that KB34 antenna which was the subject of the SES-MFS-20211108-01799 grant is also a 12.8 Meter Philco-Ford antenna which is essentially identical to the KA31 12.8M. Further, the emissions designators and their frequencies for which authorization is being requested for the KA31 12.8M are identical to those which were successfully coordinated with NTIA for the KB34 12.8M antenna grant and as the KA31 12.8M is only the back-up antenna for CARABINER the two antennas will not be servicing CARABINER at the same time.

It is therefore respectfully requested that all information and documentation in SES-MFS-20211108-01799, to include the successful coordination with NTIA, be incorporated by reference for this application and that the POC grant in SES-MFS-20211108-01799 for the KB34 12.8M antenna serve as the basis for grant of this application for KA31 12.8M CARABINER POC authority. Any questions with respect to this matter may be directed to James G. Lovelace at 571-599-3643.