

**REQUEST FOR MODIFICATION OF AUTHORIZATIONS
TO REMOVE 2011 CONDITION OF GRANT**

Airbus DS SatCom Government, Inc. (“Licensee”) is the holder of the authorizations identified in Attachment 1, which authorize the provision of international facilities-based and global resale telecommunications services. Licensee is a wholly owned subsidiary of Airbus DS Systems Holdings, Inc. (“ADS”), which is an indirect wholly owned subsidiary of Airbus Group SE (“Airbus”), a company organized under the corporate laws of the European Union.¹

As a condition of the Federal Communications Commission’s (“Commission”) consent to Airbus’s acquisition of the Licensee in 2011, Airbus, the Licensee, and other Airbus affiliates were required to comply with the commitments and undertakings contained in Amendment No. 3 to the November 29, 2001, Network Security Agreement (“NSA”) between Telenor Satellite Services Holdings, Inc., Telenor Satellite, Inc., Telenor Satellite Services, Inc., and Telenor Broadband Services, and the Department of Justice and the Federal Bureau of Investigations, as amended by Amendment No. 1 in March 2007 and Amendment No. 2 in October 2008.²

On July 31, 2015, ADS and Satcom Direct Communications (“SDC”) requested Commission consent to the transfer of control of the Licensee from ADS to Satcom (the “Satcom Applications”).³ SDC is controlled by two U.S. citizens.⁴ After the proposed transaction is consummated the Licensee will be controlled by two U.S. citizens.

Licensee respectfully requests that the condition on its authorizations that it comply with the terms of the NSA be removed, subject to the latter of: (1) the consummation of the Satcom Applications; or (2) Team Telecom’s approval of the Licensee’s request to be removed as a party to NSA. Licensee also respectfully requests that the Commission refer this application to Team Telecom so that Team Telecom can consider the removal of Licensee as a party to the NSA, along with any other necessary or appropriate amendments to the NSA.

Grant of the instant application is in the public interest. It will, for example, enhance competition and continued service in the satellite services marketplace by removing unnecessary, legacy NSA requirements that were imposed on ASGI due to foreign ownership considerations.

¹ In 2012, Airbus reported to the Commission that Vizada, Inc. changed its name to Astrium Services Government, Inc. See IBFS File No. ITC-T/C-20121128-00313. In 2014, Astrium Services Government, Inc. underwent a name change to Airbus DS SatCom Government Inc.

² Applications of Chrysaor S.à r.l. and Astrium Holding S.A.S. for Consent to Transfer of Control and Petition for Declaratory Ruling, IB Docket No.11-43, FCC File Nos. SES-T/C-20110818-00979 *et al.*

³ See FCC File Nos. SES-T/C-20150804-00504, SES-T/C-20150804-00503, and ITC-T/C-20150804-00192.

⁴ SDC’s equity is held by a U.S. citizen and a U.S. trust. The trust at issue is a living trust controlled by a sole trustee who is also the settlor, James W. Jensen. Mr. Jensen is a U.S. citizen, and is the CEO and founder of both SDC and its corporate affiliate Satcom Direct, Inc. Thus, SDC is ultimately controlled by two U.S. citizens.

FCC LICENSES AND AUTHORIZATIONS

Satellite Earth Station Licenses (Part 25)

LICENSEE	CALL SIGN	CLASS OF STATION
Airbus DS SatCom Government, Inc.	KA304	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	KA313	Earth Stations On-Board Vessels
Airbus DS SatCom Government, Inc.	KA312	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	WA28	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	E990034	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	E990032	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	KB34	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	KA305	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	KA31	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	E990027	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	E980136	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	E930320	Fixed Earth Station
Airbus DS SatCom Government, Inc.	E980137	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	E990422	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	E890649	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	KA249	Fixed Land Earth Stations
Airbus DS SatCom Government, Inc.	E000280	MES Blanket License – Inm GAN
Airbus DS SatCom Government, Inc.	E000282	MES Blanket License – Inm Mini-M
Airbus DS SatCom Government, Inc.	E000283	MES Blanket License - Inm M
Airbus DS SatCom Government, Inc.	E000284	MES Blanket License – Inm C
Airbus DS SatCom Government, Inc.	E000285	MES Blanket License – Inm B
Airbus DS SatCom Government, Inc.	E050276	MES Blanket License – Inm BGAN
Airbus DS Satcom Government, Inc.	E040390	Fixed Land Earth Station – Slovak Consulate – NY, NY

International Section 214 Authorizations⁵

AUTHORIZATION HOLDER	FILE NO.	DESCRIPTION OF AUTHORIZATION	AUTHORIZATION STATUS/ FCC/DA NO.	DATE GRANTED
Airbus DS SatCom Government, Inc.	ITC-214-19860710-00002	Authority to install and operate a compressed television system at Southbury, CT and Santa Paula, CA coast earth stations for use in providing maritime video transmission service to ships.	Order and Authorization and Certificate (July 10, 1986), 1986 FCC LEXIS 3042	July 10, 1986
Airbus DS SatCom Government, Inc.	ITC-214-19861016-00003	Authority to participate in an Inmarsat program to lease the L-band capacity of the Marisat system.	Memorandum Opinion, Order and Authorization (Oct. 16, 1986), DA 86-83, 1986 FCC LEXIS 2492;	Oct. 16, 1986
Airbus DS SatCom Government, Inc.	ITC-214-19870226-00006	Authority to interconnect with Graphnet, Inc. and ITT offshore points.	Memorandum Opinion and Order (Feb. 26, 1987), DA 87-212, 1987 FCC LEXIS 4346;	Feb. 26, 1987
Airbus DS SatCom Government, Inc.	ITC-214-19870630-00007	Authority to exchange traffic between ship earth stations and foreign points served by Consortium Communications International, Inc.	Order and Authorization (June 30, 1987), DA 87-854, 1987 FCC LEXIS 3541	June 30, 1987
Airbus DS SatCom Government, Inc.	ITC-214-19880630-00009	Authority to interconnect ship earth stations with overseas points served by MCII.	Order and Authorization (June 30, 1988), DA 88-1050, 1988 FCC LEXIS 1327	June 30, 1988
Airbus DS SatCom Government, Inc.	ITC-214-19890928-00007	Authority to provide international aeronautical MSS, subject to certain conditions.	Memorandum Opinion, Order and Authorization (Sept. 28, 1989), DA 891259, 1989 FCC LEXIS 1973	Sept. 28, 1989
Airbus DS SatCom Government, Inc.	ITC-214-19900913-00017	Authority to upgrade Southbury, CT land earth station to allow fourth ocean region (AOR E and -W).	Order and Authorization (Sept. 13, 1990), DA 90-1240, 1990 FCC LEXIS 5019	Sept. 13, 1990

⁵ The Commission previously reviewed many of the authorizations in this chart as part of a 2011 transaction. *See, e.g.*, https://apps.fcc.gov/edocs_public/attachmatch/DA-11-1488A1_Rcd.pdf, Applications of Chrysaor S.à r.l. and Astrium Holding S.A.S. for Consent to Transfer of Control and Petition for Declaratory Ruling, IB Docket No.11-143, FCC File Nos. SES-T/C-20110818-00979 *et al.*, and IBFS File Nos. ITC-T/C-20110818-00265 and ITC-T/C-20110818-00266. This chart includes information for authorizations currently held by the Licensee that were in that transaction, as well as a few additional authorizations that were obtained after that transaction.

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AUTHORIZATION HOLDER	FILE NO.	DESCRIPTION OF AUTHORIZATION	AUTHORIZATION STATUS/ FCC/DA NO.	DATE GRANTED
Airbus DS SatCom Government, Inc.	ITC-214-19901231-00018	Authority to implement a dual-satellite system in AOR (MCS-B and MARECS-B2) and POR (MCS-D and MARECS-A); to construct and operate earth stations in Southbury, CT and Santa Paula, CA.	Order and Authorization (Dec. 31, 1990), DA 90-1940, 1991 FCC LEXIS 281	Dec. 31, 1990
Airbus DS SatCom Government, Inc.	ITC-214-19911230-00019, ITC-214-19911230-00020	Authority to provide Inmarsat Standard M and Standard B services in AOR and POR.	Memorandum, Opinion, Order and Authorization (Dec. 30, 1991), DA 911650, 1992 FCC LEXIS 143	Dec. 30, 1991
Airbus DS SatCom Government, Inc.	ITC-214-19920121-00132	Authority to provide interim limited aeronautical MSS via Inmarsat within the United States (until launch of domestic MSS spacecraft-AMSC).	Memorandum, Opinion and Order (Jan. 21, 1992), FCC 92-25, 1992 FCC LEXIS 682	Jan. 21, 1992
Airbus DS SatCom Government, Inc.	ITC-214-19920131-00133	Authority to interconnect authorized Inmarsat services with AT&T PSTN facilities.	Order and Authorization (Jan. 31, 1992), DA 92-131, 1992 FCC LEXIS 742	Jan. 31, 1992
Airbus DS SatCom Government, Inc.	ITC-214-19920312-00134	Authority to interconnect Inmarsat Standard C facilities with a Sprint division.	Order and Authorization (March 12, 1992), DA 92-322, 1992 FCC LEXIS 1377	March 12, 1992
Airbus DS SatCom Government, Inc.	ITC-214-19920326-00135	Authority to provide Inmarsat Standard A in IOR and to acquire and operate associated leased line facilities.	Memorandum Opinion, Order and Authorization (March 26, 1992), DA 92-385, 1992 FCC LEXIS 1690	March 26, 1992
Airbus DS SatCom Government, Inc.	ITC-214-19920512-00136	Authority to provide certain point-to-multipoint data service in shore-to-ship direction in AOR, POR and IOR.	Memorandum, Opinion, Order and Authorization (May 12, 1992), DA 92-586, 1992 FCC LEXIS 2623	May 12, 1992
Airbus DS SatCom Government, Inc.	ITC-214-19920904-00137	Authority to provide certain video services in shore-to-ship direction in AOR and POR.	Memorandum, Opinion, Order and Authorization (Sept. 4, 1992), DA 92-1254, 1992 FCC LEXIS 5455	Sept. 4, 1992

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Airbus DS SatCom Government, Inc.	ITC-214-19910930-00021, ITC-214-19910930-00022, ITC-214-19910930-00023, ITC-214-19910930-00024	Authority to provide Inmarsat Standard C service to aeronautical users in AOR-West and POR.	Order on Reconsideration: Memorandum, Opinion, Order and Authorization (Sept. 16, 1992), DA 92-1282, 1992 FCC LEXIS 5474 Memorandum, Opinion, Order and Authorization (Sept. 30, 1991) DA 91-1251, 1991 FCC LEXIS 5345	Sept. 16, 1992 Sept. 30, 1991
Airbus DS SatCom Government, Inc.	ITC-214-19930112-00263, ITC-214-19930112-00264, ITC-214-19930112-00265, ITC-214-19930112-00266, ITC-214-19930112-00267, ITC-214-19930112-00268, ITC-214-19930112-00269, ITC-214-19930112-00270	Authority to provide international land mobile-satellite and land-based temporary FSS within and between foreign countries and between LES in the U.S. and Turkey and MSS terminals outside of North America.	Memorandum Opinion, Order and Certificate (Jan. 12, 1992), FCC 93-21, DA 91-1650, 1993 FCC LEXIS 343	Jan. 12, 1993
Airbus DS SatCom Government, Inc.	ITC-214-19931217-00271	Authority to provide Inmarsat Standard C satellite services to AOR customers and upgrade Southbury, CT LES (KA-312) with Inmarsat Standard C capability.	Memorandum Opinion, Order and Authorization (Dec. 17, 1993), DA 93-1542, 1993 FCC LEXIS 6448	Dec. 17, 1993
Airbus DS SatCom Government, Inc.	ITC-214-19940131-00395	Authority to interconnect Inmarsat MSS services with Sprint PSTN facilities.	Order, Authorization and Certificate (Jan. 31, 1994), DA 94-137, 1994 FCC LEXIS 704	Jan 31, 1994
Airbus DS SatCom Government, Inc.	ITC-214-19960501-00176 ⁶	Authority to interconnect Inmarsat satellite facilities with those of commercial Internet service providers.	Order (Nov. 22, 1996), DA 96-1961, 1996 FCC LEXIS 6477	Nov. 22, 1996

⁶ In 2001, authorizations held by Comsat Corporation and Comsat Mobile Communications were acquired by Telenor Satellite, Inc. See IBFS File Nos. SES-ASG-20010504-00896 *et al.* In 2007, Telenor Satellite, Inc. changed its name to Vizada Satellite, Inc., and in 2008 it merged with Vizada, Inc., with Vizada, Inc. surviving the merger. See IBFS File Nos. ISP-PDR-20060804-00010 and ISP-PDR-20080501-00011. In 2011, Vizada, Inc. was acquired by the Licensee's parent company, Airbus Group SE (then called European Aeronautic Defence and Space Company EADS N.V.). See IBFS File Nos. ITC-T/C-20110818-00266 *et al.* In 2012, Airbus reported to the Commission that Vizada, Inc. changed its name to Astrium Services Government, Inc. See IBFS File No. ITC-T/C-20121128-00313. In 2014, Astrium Services Government, Inc. underwent a name change to Airbus DS SatCom Government Inc.

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Airbus DS SatCom Government, Inc.	CC Docket No. 87-75 ⁷	Authority for Comsat for the use of Inmarsat Space Segment to provide AMS(R) S and AMSS on an ancillary basis.	Report and Order and Authorization (Oct. 5, 1998), FCC 98-262, 1998 FCC LEXIS 5464	Oct. 5, 1998
Airbus DS SatCom Government, Inc.	SES-MS-19990331-02474 ⁸	Authority to provide Inmarsat A maritime and land mobile services via earth station facilities at Kuantan, Malaysia in the IOR.	Granted June 19, 2001	
Airbus DS SatCom Government, Inc.	SAT-ITC-20000605-00103, ITC-97-222; ITC-214-19970414-00206	Authority to provide U.S. domestic land mobile and aeronautical services.	Memorandum Opinion, Order and Authorization (Sept. 24, 2001), FCC 01-272	Sept. 24, 2001
Airbus DS SatCom Government, Inc.	ITC-214-19940217-00396	Authority to provide Inmarsat-C in the IOR through a Norwegian LES at Eik, Norway.	Order, Authorization and Certificate (Feb. 17, 1994), DA 94-176, 1994 FCC LEXIS 902	Feb. 17, 1994
Airbus DS SatCom Government, Inc.	ITC-214-19960510-00018	Authority to provide currently authorized services using Inmarsat third generation satellites.	Memorandum Opinion and Order (May 10, 1996), DA 96-742	May 10, 1996
Airbus DS SatCom Government, Inc.	ITC-214-19931203-00272	Authority to interconnect with NASA.	Order and Authorization (Dec. 3, 1993), DA 93-1464, 1993 FCC LEXIS 6274	Dec. 3, 1993
Airbus DS SatCom Government, Inc.	SES-ASG-20010504-00896 <i>et seq.</i> ⁹	Assignment of COMSAT 214 authorizations to Telenor Satellite, Inc.	Order and Authorization (Dec. 14, 2001), FCC 01-369	Dec. 14, 2001

⁷ Applications of Lockheed Martin Global Telecommunications *et al.* and Telenor Satellite Mobile Services, Inc. *et al.* for Consent to the Assignment of Section 214 Authorizations, Private Land Mobile Radio Licenses, Experimental Licenses, and Earth Station Licenses and Petition for Declaratory Ruling, *Order and Authorization*, IBFS File Nos. SES-ASG-20010504-00896 *et al.*, 16 FCC Rcd 22897, Appx. A (2001) (identifying the authorization as a “214”).

⁸ *Id.*

⁹ This is the 2001 transaction referenced in footnote 4.

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Airbus DS SatCom Government, Inc.	ITC-214-19940121-00394	Authority to provide Inmarsat M and Inmarsat B in IOR and to acquire and operate associated leased facilities.	Order, Authorization and Certificate (Jan. 21, 1994), DA 94-108, 1994 FCC LEXIS 609	Jan. 21, 1994
Airbus DS SatCom Government, Inc.	ITC-214-20061213-00558	Global Facilities and Resale Based Service Authorization	Report DA 07-2041	May 10, 2007
Airbus DS SatCom Government, Inc.	ITC-214-20061213-00559, ITC-T/C-20100917-00368	Global Facilities and Resale Based Service Authorization	Report DA 10-412	March 10, 2010
Airbus DS SatCom Government, Inc.	ITC-214-20020926-00462	Global Facilities and Resale Based Service Authorization	Report No. TEL-00593, DA 02-2926 (Oct. 31, 2002)	Oct. 31, 2002