

Modification Application
Call Sign E140114
File Nos. SES-LIC-20141030-00832; SES-MFS-20150923-00605

Exhibit A

Request to Modify License

1. INTRODUCTION AND SUMMARY

In this application, ISAT US, Inc. (“ISAT”), a subsidiary of Inmarsat Global Ltd., seeks authority to modify its license Call Sign E140114 authorizing the operation of Ka band blanket licensed terminals on aircraft (“Aero License”)¹ to seek authority to use the two Earth station terminal types, authorized under the Aero License (“Aero Terminals”), at fixed and/or temporary fixed locations on land within CONUS and U.S. territories and its possessions. No other changes are requested by this modification application.

2. USE OF AERO TERMINALS ON LAND

ISAT seeks to modify the Aero License to allow for the operation of the Aero Terminals at fixed and/or temporary fixed locations on land within CONUS and U.S. territories. The operation of the Aero Terminals while at fixed or temporary fixed locations on land is necessary to allow ISAT to conduct crucial and necessary testing of the GX network and terminals, and as part of training and demonstrations to potential customers. Operation of the Aero Terminals on land will be consistent with the technical parameters specified in the existing license. Moreover the number of terminals that would operate on land is not expected to exceed approximately twenty at any given time and can be accommodated within the number of terminals already licensed.²

For the proposed operations at fixed or temporary fixed locations, the performance characteristics of each antenna type, the antenna pointing capabilities and the network control

¹ See, ISAT US, Inc., Call Sign E140114, File Nos. SES-LIC-20141030-00832; SES-MFS-20150923-00605 (“Aero Application”).

² For purposes of expediency, ISAT does not seek primary status for any fixed operations of the Aero Terminals under this license at this time. If ISAT decides to seek primary protection for any fixed terminal operations in the future, ISAT will seek such authority in connection with a separate license.

mechanisms, will be consistent with that described in the Aero Application and thus will ensure that adjacent operations will be protected consistent with Section 25.138. ISAT US incorporates by reference the technical parameters of the Aero Terminals as set forth in the Aero Application that show compliance with the off-axis EIRP density levels in Section 25.138 of the Commission's rules. As described in more detail in the Aero Application, the Aero Terminal operations will be monitored by the Inmarsat Network Operations Center (NOC) and various engineering teams associated with the GX network testing and demonstration campaign to ensure compliance with all conditions of the existing Aero License. When operated at fixed and temporary-fixed locations, the equipment will be professionally installed and radiation exposure prevention measures will be tailored to the specific location to ensure compliance with the Commission's radiation hazard limits.

3. RESPONSE TO QUESTION 36

ISAT provides this response to Question 36 of FCC Form 312 out of an abundance of caution. In 2005, the Commission dismissed a Petition for Declaratory Ruling (the "Petition") filed by ISAT US Inc.'s affiliate, Inmarsat Global Limited ("Inmarsat Global"), seeking United States market access to provide MSS in the 2 GHz band. Subsequent to Inmarsat Global's filing, the Commission assigned all 2 GHz spectrum currently allocated for MSS in the United States to two other satellite operators, and thus dismissed Inmarsat Global's Petition.³

³ *Use of Returned Spectrum in the 2 GHz Mobile Satellite Service Frequency Bands*, 20 FCC Rcd 19696 (2005); *Inmarsat Global Limited, Petition for Declaratory Ruling to Provide Mobile Satellite Service to the United States Using the 2 GHz and Extended Ku-Bands*, 20 FCC Rcd 19409 (2005).