

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
ISAT US, Inc.	)	File No. SES-MOD-20161130-00917
	)	
Application to Modify Maritime Earth	)	Call Sign: E140029
Station License	)	

**REPLY TO OPPOSITION**

Iridium Constellation LLC (“Iridium”) hereby replies to the Opposition filed by ISAT US, Inc. (“ISAT”) concerning ISAT’s above-referenced application (“Application”). As explained below, given the unique and narrow scope of ISAT’s proposed operations, and given ISAT’s curing of the defects raised in Iridium’s Petition to Deny, Iridium no longer opposes ISAT’s Application. In light of this unique and narrow scope, however, action on the Application should not be viewed as precedent for Earth Stations in Motion (“ESIM”) operating in Iridium feeder link bands generally or for interference criteria that might apply to ESIM in this band.

**I. BACKGROUND AND INTRODUCTION**

In its Application, ISAT seeks to modify its Fixed Satellite Service (“FSS”) maritime earth station license, proposing to operate in the 29.1-29.5/19.3-19.7 GHz bands on U.S.-flagged vessels in the Southern Atlantic Ocean near the coast of South Africa.

Iridium filed a Petition to Deny the Application because: (1) ISAT's proposal was inconsistent with the FCC's band plan and ISAT had not requested a waiver of the band plan; (2) ISAT had not acknowledged that because the proposed use was a non-conforming use, it must not cause interference to and would have to accept interference from authorized operations; (3) ISAT had not made a showing as to the potential for its proposed operations to interfere with Iridium's feeder links that operate in the 29.1-29.3 GHz and 19.4-19.6 GHz bands; and (4) ISAT's claim it had coordinated its proposed operations with Iridium was incorrect.<sup>1</sup>

ISAT filed an Opposition to Iridium's Petition in which it: (1) requested a waiver of the FCC's band plan for the proposed frequencies of operation; (2) acknowledged it must not cause interference and would have to accept interference; (3) made a showing it would not interfere with Iridium's feeder links based on the large distances between its proposed operations and Iridium's gateway earth stations; and (4) continued to assert that its coordination agreements with Iridium cover the proposed earth station operations.<sup>2</sup>

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<sup>1</sup> Petition to Deny of Iridium Constellation LLC, File No. SES-MOD-20161130-00917 (filed Mar. 3, 2017).

<sup>2</sup> Opposition of ISAT US, Inc., SES-MOD-20161130-00917 (filed Mar. 16, 2017).

**II. GIVEN THE NARROW SCOPE OF ISAT'S PROPOSAL AND THE CURING OF THE DEFECTS RAISED IN IRIDIUM'S PETITION TO DENY, IRIDIUM NO LONGER OPPOSES ISAT'S APPLICATION**

As stated above, in its Opposition to Iridium's Petition to Deny, ISAT requested a waiver of the FCC's band plan for its proposed nonconforming operations, acknowledged it must not cause interference to authorized services, and recognized it would have to accept interference from authorized services. Given the unique and narrow scope of ISAT's proposal involving earth stations on U.S.-flagged ships operating off the coast of South Africa, and given ISAT's curing of the defects raised in Iridium's Petition to Deny, Iridium no longer opposes ISAT's Application.

**III. ACTION ON INMARSAT'S APPLICATION SHOULD NOT BE VIEWED AS A PRECEDENT**

Iridium emphasizes that any action on the Application should not be viewed as precedent for ESIM operating in Iridium feeder link bands generally or for interference criteria that might apply to ESIM in this band. Instead, any action on the Application should be limited in scope to the narrowly-circumscribed ESIM operations covered by the Application.

In addition, Iridium continues to disagree with ISAT's claim that it has coordinated the proposed operations with Iridium. However, given that Iridium no longer is opposing ISAT's Application, this issue has become moot.

Respectfully submitted,

**IRIDIUM CONSTELLATION LLC**

By: /s/Maureen C. McLaughlin  
Vice President Public Policy  
Iridium Constellation LLC  
1750 Tysons Boulevard  
Suite 1400  
McLean, VA 22102  
(703) 287-7518

March 28, 2017

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **REPLY TO  
OPPOSITION OF IRIDIUM CONSTELLATION LLC** was sent by first class mail,  
postage prepaid, this 28<sup>th</sup> day of March, 2017, to:

Giselle Creeser  
1101 Connecticut Avenue, NW  
Suite 1200  
Washington, D.C. 20036

/s/ Katia Carty