

Comsat, Inc.

**Application for Authority to Utilize Extended Ku-band Frequencies for the
SBY301KU 9 Meter Antenna to
Communicate With the Telstar 12V Satellite**

File Number SES-MOD-20151009-00703

Call Sign KA304

Comsat, Inc. ("Comsat") respectfully seeks modification of its Southbury, Connecticut KA304 license to authorize the SBY301KU 9 meter transmit/receive earth station antenna to communicate with the Telstar 12V (T12V) satellite (15.0 W.L.) in the Extended Ku-band. This antenna currently has authorization to communicate with three other satellites in the Extended Ku-band. These authorizations are for Amazonas 2 (SES-MFS-20051202-01669), Estrela do Sul (SES-MFS-20070511-00636) and Telstar 11N (SES-MOD-20100517-00615). Comsat notes that at the time those authorizations were requested and granted the SBY301KU antenna authorization was on the WB36 license. It was moved to the KA304 license in 2015.

Comsat respectfully requests that the Extended Ku Compliance Analysis's which were submitted in the above listed applications be accepted to satisfy the Compliance Analysis requirement for this T12V application. The Extended Ku Compliance Analysis which was submitted with the Telstar 11N application (SES-MOD-20100517-00615) is attached herewith as Exhibit B. (The title of this document indicates it is for the Vizada, Inc. WB36 license because as explained above the SBY301KU antenna was authorized on the WB36 license at that time and Comsat was then known as Vizada.) The other two (SES-MFS-20051202-01669 and SES-MFS-20070511-00636) are hereby incorporated by reference.

No coordination report is required for this application as no changes are being made to the coordination authorizations currently set forth in the license. The authorized values set forth in the Section C) Frequency Coordination section of KA304 will cover communication of SBY301KU with T12V. Likewise, no changes are being made to the emission designators set forth in the Section B) Particulars of Operations or the specifications set forth in the Section E) Antenna Facilities section of the license. The same Extended Ku-band emission designators and antenna specifications currently authorized will be used for communication of SBY301KU with T12V. The only modification that is being requested by this application is to add the T12V satellite as a Point of Communication for SBY301KU.

Finally, Comsat notes that the International Bureau has previously completed successful coordination with the NTIA for operation of SBY301KU in the Extended Ku-band. Comsat understands that the NTIA had no objection to grant of this authority subject to the following conditions:

The user must provide the Naval Electromagnetic Spectrum Center (703-325-2750) a 24 hour phone number which would be contacted when national defense and U.S. Naval operation requirements necessitate immediate cessation of operations.

The applicant is aware that they would be required to temporarily cease satellite operations on these frequencies until notified otherwise.

Comsat agrees to continue to fully comply with these conditions for T12V operations as well. It has provided the Naval Electromagnetic Spectrum Center with the 24 hour phone number, 203-262-5000 for contact with the Southbury teleport when national defense and U.S. Naval operation requirements necessitate immediate cessation of operations. Comsat confirms that it understands that it would be required to temporarily cease satellite operations on these frequencies until notified otherwise and agrees to immediately cease transmissions if so requested.

Comsat therefore respectfully requests that the modification of the KA304 license to add T12V as a Point of Communication for SBY301KU be granted. Any questions should be directed to James G. Lovelace at 571-599-3643.