



June 15, 2018

By Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Certification of Completion of Earth Station Construction
Call Signs E160065, E160066, E160067, E160068 & E160069
File Nos. SES-LIC-20160330-00355, SES-LIC-20160330-00356, SES-LIC-20160330-00357, SES-LIC-20160330-00358, SES-LIC-20160330-00359, SES-MOD-20170607-00622, SES-MOD-20170607-00623, SES-MOD-20170607-00626, SES-MOD-20170607-00627 & SES-MOD-20170607-00628

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 25.133(b)(1), HNS License Sub, LLC (“HNS”) certifies the following:

- (i) construction of the above-referenced earth stations, licensed on July 13, 2016 (as subsequently modified on July 31, 2017), has been completed, and the earth stations have been tested and found to perform within authorized gain patterns and off-axis EIRP density levels;
- (ii) the earth stations are operational, as of June 14, 2018;¹

¹ The earth stations are authorized to communicate with the Telstar 19V satellite, scheduled to launch in the third quarter of 2017. Thus, earth station operations currently are limited to test transmissions, and full commercial operations will commence upon launch of Telstar 19V. See *Improving Public Safety Communications in the 800 MHz Band*, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd 4393 ¶ 48 (2008) (“[F]or purposes of certifying that a satellite system is operational, we have not required that the certification be based upon commencement of full commercial operations [T]he certification [for 2 GHz mobile satellite systems] can be based upon [test] transmissions . . . and does not require commencement of full commercial operations.”). In an abundance of caution, HNS requests a waiver, to the extent required, of the one-year construction/operation requirement to permit commencement of earth station operations (as extended by the modification granted on July 31, 2017) based upon limited test transmissions, followed by full commercial operations upon launch of Telstar 19V. The requested waiver is consistent with the underlying regulatory purpose to ensure prompt deployment, and otherwise serves the public interest. See 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular Tel. Co., L.P. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

- (iii) the earth stations will remain operational during the license period, unless the license is submitted for cancellation.

Please direct any questions regarding this matter to the undersigned.

Sincerely,

/s/ Jennifer A. Manner

Jennifer A. Manner
Senior Vice President, Regulatory Affairs

cc: Paul Blais (FCC)