

October 5, 2021

Via IBFS

Marlene H. Dortch, Secretary Federal Communications Commission 45 L Street NE Washington, DC 20554

Re: Anuvu Licensing Holdings LLC, IBFS File No. SES-MOD-20170908-00994, as amended by SES-AMD-20181003-03223 (Call Sign E160163)

Dear Ms. Dortch:

Transmitted herewith on behalf of Anuvu Licensing Holdings LLC ("Anuvu") is a mark-up proposing revisions to the draft authorization implementing the modified license originally requested in the above-referenced application files. A significant portion of the authority initially requested by Anuvu's predecessor in interest, MTN License Corp., included the use of specific extended Ku-band frequencies coordinated for use on the Intelsat 29e satellite at the nominal 50° West longitude orbital location. As that satellite was declared a total loss 18 months ago, much of the spectrum use originally sought is no longer required, and the attached proposed revisions limit the revisions to the license to those that remain necessary in the wake of the loss of Intelsat 29e.

Should there be any questions regarding this matter, please contact the undersigned counsel.

Respectfully submitted,

s/David S. Keir
David S. Keir

Counsel to Anuvu Licensing Holdings LLC

Attachment

cc: Trang Nguyen

ATTACHMENT

Anuvu Licensing Holdings LLC
Proposed Edits to Draft Radio Station Authorization

FCC File Number: SES-MOD-20170908-00994

Call Sign: E160163



RADIO STATION AUTHORIZATION

Call Sign: E160163

Anuvu Licensing Holdings LLC

Authorization Type: Modification of License File Number: SES-MOD-20170908-00994

Non Common Carrier Grant date: Expiration Date: 12/07/2031

Nature of Service: Fixed Satellite Service

Class of Station: Fixed Earth Stations

A) Site Location(s)

# Site ID	Address	Latitude	Longitude	Elevation (Meters)	Special Provision NAD (Refer to Section I
1) 1	200 Telegraph Hill Road Holmdel, Monmouth, NJ 07733	40°23'42.0"N	74°10'24.0"W	104.27	83
	Licensee certifies antenna(s) comply with g	ain patterns sp	ecified in	Section 25.209
2) 1A	200 Telegraph Hill Road Holmdel, Monmouth, NJ 07733	40°23'42.0"N	74°10'24.0"W	104.27	83
	Licensee certifies antenna(s) comply with g	ain patterns sp	ecified in	Section 25.209

Subject to the provisions of the Communications Act of 1934, The Communications Satellite Act of 1962, subsequent acts and treaties, and all present and future regulations made by this Commission, and further subject to the conditions and requirements set forth in this license, the grantee is authorized to construct, use and operate the radio facilities described below for radio communications for the term beginning December 7, 2016 (3 AM Eastern Standard Time) and ending December 7, 2031 (3 AM Eastern Standard Time). The required date of completion of construction and commencement of operation is 00/00/0000. Grantee must file with the Commission a certification upon completion of construction and commencement of operation.

B) Particulars of Operations

The General Provision 1010 applies to all receiving frequency bands.

The General Provision 1900 applies to all transmitting frequency bands.

For the text of these provisions, refer to Section H.

#	Frequency (MHz)	Polarizatio Code	n Emission	Tx/Rx Mode	Max EIRP /Carrier (dBW)	Max EIRP Density /Carrier (dBW/4kHz)	Associated Antenna	Special Provisions (Refer to Section H)	Modulation/ Services	
1) 140	00.0000-14500.0000	H, V	36M0G7D	Tx	85.78	46.23	HOLM9.0 II		(Digital Data)	
2) 140	00.0000-14500.0000	H, V	36M0G7W	Tx	85.78	46.23	HOLM9.0 II		Digital Data	
3) 137.	50.0000-14000.0000		50K0C7W	ĪX	53.90	42.30	HOLM9.0 II		Digital	
	50.0000 14000.0000	<u> </u>	40M5C7W	Īx	71.80	31.00	HOLM9.0 II		Digital Data	
5) 137.	50.0000-14000.0000		50K0G7W	ΙX	53.90	42.30	HOLM9.0 II		Digital Data	



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The General Provision 1010 applies to all receiving frequency bands.

The General Provision 1900 applies to all transmitting frequency bands.

For the text of these provisions, refer to Section H. Max Max EIRP Special									
#	Frequency (MHz)	Polarizatio Code	on Emission	Tx/Rx Mode	EIRP /Carrier (dBW)	Density /Carrier (dBW/4kHz)	Associated Antenna	Provisions (Refer to Section H)	Modulation/ Services
8)	13251.0000-13750.0000	H, V	40M5G7W	Tx	66.30	42.30	HOLM9.0 II		Digital Data
7) :	13251.0000-13750.0000	H, V	58K0G7₩	Tx	66.30	42.30	HOLM9.0 II		Digital Data
8) :	13176.0000-13223.0000	H, V, L,	R 40M5G7W	Tx	66.30	42.30	HOLM9.0 II		Digital
9) :	13176.0000-13223.0000	H, V, L,	R 58K0G7W	Tx	66.30	42.30	HOLM9.0 II		Digital
10) :	13176.0000-13223.0000	H, V	40M5G7W	Tx	66.30	42.30	HOLM9.0 II		Digital Data
11)	13176.0000-13223.0000	Η, ∨	58K0G7W	Tx	66.30	42.30	HOLM9.0 II		Digital Data
12)	13126.0000-13148.0000	H, V, L,	R 40M5G7W	Tx	66.30	42.30	HOLM9.0 II		Digital
13) :	13126.0000-13148.0000	H, V, L, V	R 58K0G7W	Tx	66.30	42.30	HOLM9 0 II		Digital
14)	13126.0000-13148.0000	H, V	40 M 5G7W	Tx	66.30	42.30	HOLM9.0 II		Digital Data
15) :	13126.0000-13148.0000	H, V	58K0G7W	Τx	66.30	42.30	HOLM9.0 II		Digital Data
16) :	13001.0000-13098.0000	H, V, L,	R 40M5G7W	±¥	66.30	42.30	HOLM9.0 II		Digital
17) :	13001.0000-13098.0000	H, V, L,	R 58K0G7W	Τ×	66.30	42.30	HOLM9.0 II		Digital
18)	13001.0000-13098.0000	H, V	40M5G7W	Tx	6.20	42.30	HOLM9.0 II		Digital Data
19) :	13001.0000-13098.0000	H, V	58K0G7₩	Ŧ	66.30	42.30	HOLM9.0 II		Digital Data
20) :	12851.0000-12973.0000	H, V, L,	R 40M5G7W	Tx	66.30	42.30	HOLM9.0 II		Digital
21)	12851.0000-12973.0000	H, V, L,	R 58K0 57W	Tx	66.30	42.30	HOLM9.0 II		Digital
22)	12851.0000-12973.0000	H, ∨	40M5G7W	Tx	66.30	42.30	HOLM9.0 II		Digital Data
23) :	12851.0000-12973.0000	H.V	58K0G7W	Tx	66.30	42.30	HOLM9.0 II		Digital Data
24)	12750.0000-12823.0000	H, V, L,	R 40M5G7W	Tx	66.30	42.30	HOLM9.0 II		Digital
25)	12750.0000-12823.0000	H, V, L,	R 58K0G7W	Tx	66.30	42.30	HOLM9.0 II		Digital
26) :	12750.0000-12823.0000	H,V	40M5G7W	Tx	66.30	42.30	HOLM9.0 II		Digital Data
27) :	12750.000-12823.0000	H,V	58K0G7W	Tx	66.30	42.30	HOLM9.0 II		Digital Data
28) :	12/00.0000-12500.0000	H, V, L,	R 40M5G7W	Rx			HOLM9.0 II		Digital
28)	12200.0000-12500.0000	H, V, L,	R 58K0G7W	Rx			HOLM9.0 II		Digital

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RADIO STATION AUTHORIZATION

Call Sign: E160163

Anuvu Licensing Holdings LLC

Authorization Type: Modification of License File Number: SES-MOD-20170908-00994

Non Common Carrier Grant date: Expiration Date: 12/07/2031

B) Particulars of Operations

The General Provision 1010 applies to all receiving frequency bands.

The General Provision 1900 applies to all transmitting frequency bands.

For the text of these provisions, refer to Section H.

For the	Frequency (MHz)	Polarization Code		Tx/Rx Mode	Max EIRP /Carrier (dBW)	Max EIRP Density /Carrier (dBW/4kHz	Associated	Special Provisions (Refer to Section H)	Modulation/ Services	
30) 12	2200.0000-12500.0000	II, V	10M5G7W	KΧ			HOLM9.0 II		Digital Data	
31) 12	2200.0000 12500.0000	н, 17	50K0C7W	īλ			HOLMO.0 II		Digital Data	
32) 11	700.0000-12200.0000	H,V	36M0G7D	Rx			HOLM9.0 II		Digital Data	
33) ₁₁	700.0000-12200.0000	(H, V)	36M0G7W	Rx			HOLM9.0 II		Digital Data	
3 4) ₁₁	700.0000-12200.0000	H, V	36M0G7W	Rx			HOLM9.0 II		Digital Data	Duplicate
35) ₁₁	.700.0000-12200.0000	(H, V)	40M5G7W	Rx			HOLM9.0 II		Digital Data	
86) ₁₁	450.0000-11700.0000	H, V	40M5G7W	Rx			HOLM9.0 II		Digital Data	
R7) <u>11</u>	200.0000 11450.0000	н, v	40M5C7W	Rx			HOIMO O II		Digital Data	•
88) 10	950.0000-11200.0000	(H, V)	40M5G7W	Rx			HOLM9.0 II		Digital Data	
9) 10	7700.0000-11700.0000	H,V,L,R	40M5G7W	KΧ			HOLM9.0 II		Digital	
	1700 0000 <u>11700 0</u> 000	H,V,L,R	50KOG7W	KΧ			поъмэ.0 11		Digital	
	950. 11200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200. 1200.	H, V	58K0G7W	(Rx)			HOLM9.0 II		Digital Data	
12) 10	700 0000 10050 0000	ц 17	40M5C7W	D			UOLMQ O TT		Digital Data	_
1170	00.0000-12200.0000	H,V	58K0G7W	Rж			HOLM9.0 II		Digital Data	/ INI
1145	50.0000-11700.0000	H,V	58K0G7W	Rx			HOLM9.0 II		Digital Data	← IN:
#	Frequency Limits (MHz)		Satellite (Deg. Le East Limit			vation grees) West Limit]	Azimuth (Degrees) East West Limit Limit	110111011	ard Associat	
1)	(11700.0000-12200.00	00	17.0W-14	13.0W	16.0	-07.3	112.7-255.9		HOLM9.0 II	
2)	14000.0000-14500.00		17.0W-14			-07.3	112.7-255.9			_
3) 4)	13001.0000-13098.00 -12051.0000-12973.00	00	17.0W-14			-07.3 -07.3	112.7-255.9	-0.8		_
5)	12750.0000 12023.00	00	17.0W 1	13.0W	16.0	07.3	112.7 255.9	0.8	HOLMO.0 II	_
6)	12200 0000 12500 00 10950. 0000 11200.		17.0W 1		16.0	07.3	112.7-255.9		HOLMÝ.Ú II	_
7)	0000 12750 00	00	17.0W-14	13.0W	16.0	-07.3	112.7-255.9		HOLM9.0 II	_

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C) Frequency Coordination Limits

#	Frequency Limits (MHz)	Satellite Arc (Deg. Long.) East West Limit Limit	Elevation (Degrees) East West Limit Limit	Azimuth (Degrees) East West Limit Limit	
))	13176 0000-13223.0000	17.0W-143.0W	16.0-07.3	112.7-255.9	-0.8 HOLM9.0 II
1))	13126.0000-13148.0000	17.0W-143.0W	16.0-07.3	112.7-255.9	0.8 HOLM9.0 II
1 1)	13750.0000-14000.0000	50.8W 50.0W	37.0-37.0	14 5.0- 145.0	-0.8 HOLM9.0 II
12)	13001.0000-13098.0000	17.0W-143.0W	F.0-47.3	112.7-255.9	-7.72 HOLM9.0 II
18)	12851.0000-12973.0000	17.0W 143.0W	16.0-07.3	112.7-255.9	-7.72 HOLM9.0 II
11)	12750.0000-12823.0000	17.0W-143.0W	16.0-07.3	112.7-255.9	-7.72 HOLM9.0 II
15)	12202.0000-12500.0000	17.0W-143.0W	16.0-07.3	112.7-255.9	HOLM9.0 II
16)	10700.0000 11700.0000	17.0W 143.0W	16.0 07.3	112.7 255.9	HOLMO II
17)	13750.0000 14000.0000	17.0W 143.0W	16.0 07.3	112.7 255.9	7.72 HOLM9.0 II
18)	13176.0000 13223.0000	17.0W 143.0W	16.0 07.3	112.7 255.9	7.72 HOLM9.0 II
19)	13126.0000 13140.0000	17.0W 143.0W	16.0 07.3	112.7 255.0	7.72 HOLM9 O TT
20)	11450.0000-11700.0000	17.0W-143.0W	16.0-07.3	112.7-255.9	(HOLM9.0 II)
21)	10700.0000 10950.0000	0.2W-143.0W	16.0-07.3	112.7-255.9	nolm9.0 II

D) Points of Communications

The following stations located in the Satellite orbits consistent with Sections B and C of this Entry:

E) Antenna Facilities

		tenna D	Units	Diameter (meters)	Manufacturer	Model number	Site Elevation (Meters)	Max Antenna Height (Meters)	Provisions (Refer to Section H)
ĪA	пОъм	9.0 11	Ž	9	Alpha Saccom	90 KUF KLP	104.27	9 AGL/ 113.27 AMSL	_
	Max Gains (s) .	_						
	Maximum tota	al input	POWCI	at antenna	flange (Watts) -	360.00			
	Maximum agg	regate e	output I	BIRD for al	l carriers (dDW) =	95.81			
1	HOLM	9.0 II	2	9	Alpha Satcom	90KUFRLP	104.27	9 AGL/ 113.27 AMSL	
	Max Gains(s	•	58.0 500 GH:	-	1.9500 GHz 60. dBi @ 14.1970 G	0 dBi @ 12.75 Hz	00 GHz	58.0 dBi @	
	Maximum tot	al input	power	at antenna	flange (Watts) =	360.00			
	Maximum agg:	regate c	output I	EIRP for al	l carriers (dBW) =	85.81			

Special

^{1) 1} to Permitted Space Station List



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G) Antenna Structure marking and lighting requirements:

None unless otherwise specified under Special and General Provisions

H) Special and General Provisions

- A) This RADIO STATION AUTHORIZATION is granted subject to the following special provisions and general conditions:
 - 4 --- Licensee must ensure that a current listing of the name, title, mailing address, email address, and telephone number of the responsible point of contact are on file at the FCC. Any changes must be filed electronically in the International Bureau Filing System (MyIBFS) using the "Pleadings and Comments" link on the MyIBFS homepage within 10 days of the change.
 - 6 --- Licensee must comply with the license modification and notification requirements of 47 CFR § 25.118 to change the coordinates of its authorized earth station.
 - 8 --- Licensee must notify the Commission when all earth stations under this authorization are no longer operational or when they have not been used to provide service during any continuous six-month period.
- 90398 --- Changes to previously authorized transmitting facilities, operations and devices regulated by the Commission that may have significant environmental impact, and are not excluded by §1.1306, require the preparation of an Environmental Assessment (EA) by the licensee. (See 47 C.F.R. §§1.1307, 1.1308 and 1.1311)
- 90399 --- The licensee shall, at all times, take all necessary measures to ensure that operation of this (these) authorized earth station(s) does not create potential exposure of humans to radiofrequency radiation in excess of the FCC exposure limits defined in 47 CFR §§ 1.1307(b) and 1.1310. Physical measures must be taken to ensure compliance with limits for both occupational/controlled exposure and for general population/uncontrolled exposure, as defined in these rule sections. Compliance can be accomplished in most cases by appropriate restrictions, such as fencing. Requirements for restrictions can be determined by predictions based on calculations, modeling, or by field measurements. The FCC's OET Bulletin 65 (available on-line at www.fcc.gov/oet/rfsafety) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alerting signs and protective equipment for workers.

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Non Common Carrier Grant date: Expiration Date: 12/07/2031

H) Special and General Provisions

A) This RADIO STATION AUTHORIZATION is granted subject to the following special provisions and general conditions:

90598 --- Operations must comly with with the following restrictions and limitations:

5.441: The use of the band 12.75-13.25 GHz (Earth-to-space) by geostationary-satellite systems in the fixed-satellite service shall be in accordance with the provisions of Appendix 30B. The use of the band 12.75-13.25 GHz (Earth-to-space) by a non-geostationary-satellite systems in the fixed-satellite service is subject to application of the provisions of No. 9.12 for coordination with other non-geostationary-satellite systems in the fixed-satellite service. Non-geostationary-satellite systems in the fixed-satellite service shall pot claim protection from geostationary-satellite networks in the fixed-satellite service operating in accordance with the Radio Regulations, irrespective of the dates of receipt by the Bureau of the complete coordination or notification information, as appropriate, for the non-geostationary-satellite systems in the fixed-satellite service and of the complete coordination or notification information, as appropriate, for the geostationary-satellite networks, and No. 5.43A does not apply. Non-geostationary-satellite systems in the fixed-satellite service in the above bands shall be operated in such a way that any unacceptable interference that may occur during their operation shall be rapidly eliminated.5.441

5.497: The band 12.75-13.25 GHz is also allocated to the space research (deep space) (space-to-Earth) service for reception only at Goldstone, CA (35° 20' N, 116° 53' W).

NG 52: Except as provided for by NO527A, use of the band 12.75-13.25 GHz (Earth-to-space) by geostationary satellites in the fixed-satellite service (PSS) shall be limited to international systems, i.e., other than domestic systems.

NG53: In the band 13.15-13.25 GHz, the following provisions shall apply:

- (a) The sub-band 13.15-13.2 GHz is reserved for Elevision pickup (TVPU) and cable television relay service (CARS) pickup stations inside a 50 km radius of the 100 television markets delineated in 47 CFR 76.51; and outside these areas, TVPU stations, CARS stations and non-geostationary satellite orbit fixed-satellite service (NGSO FSS) gateway earth stations shall operate on a co-princary basis.
- (b) The sub-band 13.2-13.2125 GHz is reserved for TVPU stations on a primary basis and for CARS pickup stations on a secondary basis inside a 50 km radius of the 100 television markets delineated in 47 CFR 76.51; and outside these areas, TVPU stations and NGSO FSS gateway earth stations shall operate on a co-primary basis and CARS stations shall operate on a secondary basis.
- (c) In the band 13.15-13.25 GHz, fixed television auxiliary stations licensed pursuant to applications accepted for filing before September 1, 1979, may continue operation, subject to periodic license renewals.
- (d) In the sub-band 13.15-13.2125 GHz, NGSO FSS gateway uplink transmissions shall be limited to a maximum e.i.r.p. of 3.2 dBW towards 0° on the radio horizon.

Note: The above provisions shall not apply to geostationary satellite orbit (GSO) FSS operations in the band 12.75-13 25 GHz.

NG1/8: In the bands 12.7-13.25 GHz, television translator relay stations may be authorized to use frequencies on a econdary basis to other stations in the Television Broadcast Auxiliary Service that are operating in accordance with the Table of Frequency Allocations.

US251: The band 12.75-13.25 GHz is also allocated to the space research (deep space) (space-to-Earth) service

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RADIO STATION AUTHORIZATION

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Anuvu Licensing Holdings LLC

Authorization Type: Modification of License

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for reception only at Goldstone, CA (35° 20' N, 116° 53' W); no interference is permitted.

Special and Caparal Provisions.

H) Special and General Provisions

900407 --- The Permitted Space Station List (Permitted List) is a list of all geostationary space stations providing fixed-satellite service pursuant to a Commission license or grant of U.S. market access. The Permitted List currently includes the following frequency bands per §25.103 and §25.115(k)(1):

3600-4200 MHz (space-to-Earth)

5850-6725 MHz (Earth-to-space)

10.95-11.2 GHz (space-to-Earth)

11.45-12.2 GHz (space-to-Earth)

13.75-14.5 GHz (Earth-to-space)

18.3-18.8 GHz (space-to-Earth)

19.7-20.2 GHz (space-to-Earth)

24.75-25.25 GHz (Earth-to-space)

28.35-28.6 GHz (Earth-to-space)

29.25-30.0 GHz (Earth-to-space).

Earth stations with "Permitted List" designated as a point of communication may access any space station on the Permitted List, provided the operations comply with the applicable "routine" uplink and downlink limits, are within the specific frequency bands authorized in the earth station license, have completed coordination with terrestrial stations pursuant to §25.203, and otherwise comply with all terms and conditions of both the earth station license and the space station grant.

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RADIO STATION AUTHORIZATION

Call Sign: E160163

Anuvu Licensing Holdings LLC

Authorization Type: Modification of License File Number: SES-MOD-20170908-00994

Non Common Carrier Grant date: Expiration Date: 12/07/2031

B) This RADIO STATION AUTHORIZATION is granted subject to the additional conditions specified below:

This authorization is issued on the grantee's representation that the statements contained in the application are true and that the undertakings described will be carried out in good faith.

This authorization shall not be construed in any manner as a finding by the Commission on the question of marking or lighting of the antenna system should future conditions require. The grantee expressly agrees to install such marking or lighting as the Commission may require under the provisions of Section 303(q) of the Communications Act. 47 U.S.C. § 303(q).

Neither this authorization nor the right granted by this authorization shall be assigned or otherwise transferred to any person, firm, company or corporation without the written consent of the Commission. This authorization is subject to the right of use or control by the government of the United States conferred by Section 706 of the Communications Act. 47 U.S.C. § 706. Operation of this station is governed by Part 25 of the Commission's Rules. 47 C.F.R. Part 25.

This authorization shall not vest in the licensee any right to operate this station nor any right in the use of the designated frequencies beyond the term of this license, nor in any other manner than authorized herein.

This authorization is issued on the grantee's representation that the station is in compliance with environmental requirements set forth in Section 1.1307 of the Commission's Rules. 47 C.F.R. § 1.1307.

This authorization is issued on the grantee's representation that the station is in compliance with the Federal Aviation Administration (FAA) requirements as set forth in Section 17.4 of the Commission's Rules. 47 C.F.R.§ 17.4.

The following condition applies when this authorization permits construction of or modifies the construction permit of a radio station.

This authorization shall be automatically forfeited if the station does not meet each required construction deadline by the required date of completion unless, before such date(s), a specific application is timely filed to request an extension of the construction deadline(s), supported with good cause why that failure to construct by the required date was due to factors not under control of the grantee.

Licensees are required to pay annual regulatory fees related to this authorization. The requirement to collect annual regulatory fees from regulates is contained in Public Law 103-66, "The Omnibus Budget Reconciliation Act of 1993." These regulatory fees, which are likely to change each fiscal year, are used to offset costs associated with the Commission's enforcement, public service, international and policy and rulemaking activities. The Commission issues a Report and Order each year, setting the new regulatory fee rates. Receive only earth stations are exempt from payment of regulatory fees.

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