

Exhibit D

Description of Proposed Operations

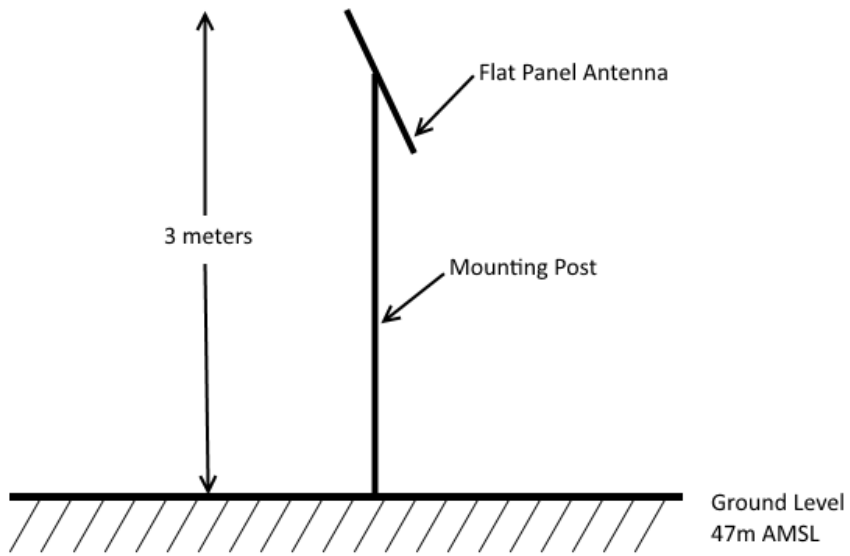
By this application, Ligado Networks Subsidiary LLC (“Ligado”) seeks authority to construct and operate a remote earth station at Kapolei, Hawaii (the “Hawaii Earth Station”), which would operate as part of Ligado’s existing satellite carrier monitoring system (“SCMS”).

Ligado’s SCMS currently consists of (i) a hub earth station located in Ottawa, Ontario and (ii) seven technically similar SCMS remote earth stations located in the United States and Canada. These earth stations operate pursuant to authority granted by the Commission and Industry Canada. In particular, the Commission has authorized the SCMS remote earth stations currently operating in the United States. *See, e.g.*, IBFS File No. SES-MOD-20160107-00026.

The Hawaii Earth Station would be technically similar to the remote earth stations that the Commission already has authorized; only the antenna would be different. Moreover, the Hawaii Earth Station would be used for the same purposes as the already-authorized SCMS remote earth stations. More specifically, and consistent with Ligado’s existing SCMS authority, the Hawaii Earth Station would be used to monitor: (i) the signal levels of Ligado’s various in-orbit spacecraft, including SkyTerra 1, MSAT-1, and MSAT-2; and (ii) the performance of the link from the Hawaii Earth Station to the hub station. The Hawaii Earth Station would not provide any end-user functionality, and would not require any coordination with terrestrial operators.

In short, the Hawaii Earth Station would be used to augment the capabilities of the SCMS and advance its underlying objectives, which the Commission already has found to be in the public interest. Accordingly, Ligado respectfully requests that the Commission grant the instant application on an expedited basis.

Section B5 Diagram



Technical Certification

I, Jim Thorpe, Senior Engineer, Ligado Networks Subsidiary LLC, certify under penalty of perjury that:

1. I am the technically qualified person with overall responsibility for preparation of the technical information contained in this application.
2. I am familiar with the requirements of Part 25 of the Commission's rules, and the information contained in the application is true and correct to the best of my knowledge and belief.

/s/ Jim Thorpe
Jim Thorpe

Dated: March 7, 2018