

## Exhibit D

### Description of Application

Pursuant to 47 C.F.R. §25.117(c), Ligado Networks Subsidiary LLC (“Ligado”) hereby requests authority to modify its blanket mobile earth terminal (“MET”) license (the “License,” call sign E980179) to reflect the pending change in orbital location of MSAT-2 (call sign AMSC-1) from its current position at 103.3°WL to a new location at 106.5°WL. Ligado is simultaneously filing with the Commission applications under §25.114(c) to (1) modify Ligado’s license for MSAT-2 to authorize operation at the new orbital location<sup>1</sup> and (2) modify Ligado’s license for its earth station in Reston, Virginia (call sign E930124) to reflect the new orbital location. MSAT-2 is expected to be relocated from its current orbital position to 106.5°WL in September/October 2018.<sup>2</sup>

Currently, the METs communicate with SkyTerra-1 as authorized by the License, and MSAT-2 acts as a backup. Ligado will continue operating MSAT-2 as a backup after relocation to the new orbital location, and thus anticipates communication from the METs to MSAT-2 only to the extent service failures or other exigencies require MSAT-2’s use.

An updated Schedule B has been filed with this application, and an updated Schedule S

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<sup>1</sup> See File No. SAT-MOD-20180912-00070. To the extent necessary, Ligado incorporates by reference the technical information submitted in that proceeding relevant to the relocation of MSAT-2. As noted in that filing, because 106.5°WL is an orbital location under Canadian authority, Ligado filed an application on August 20, 2018 with Innovation, Science & Economic Development (“ISED”) Canada to establish telemetry, tracking and command (“TT&C”) communications with MSAT-2 and will soon file a further application to operate the satellite’s service and feeder links from that location. Ligado has requested that the Commission indicate to ISED that it consents to relocating MSAT-2 to bring back into use the orbital location at 106.5°WL.

<sup>2</sup> Ligado has already received authorization from the Commission to drift MSAT-2 to the new location pursuant to its recent application for Special Temporary Authority. See FCC File No. SAT-TA-20180810-00061 (granted Aug. 28, 2018). The details of that application are incorporated by reference.

reflecting the relocation of the satellite and associated technical changes related to the L-Band operations of the satellite is being provided with the modification to Ligado's license for MSAT-2 mentioned above. This application does not request authorization for new frequencies or any other change in the currently authorized earth station parameters defined in the License. As such, as required by the Commission's rules,<sup>3</sup> Ligado hereby certifies that all other information related to this earth stations operations and not addressed in this application has not changed.

Grant of the application will facilitate the relocation of MSAT-2, without interference or harm to other operators, resulting in MSAT-2 being better accommodated in a fully coordinated orbital location and providing future certainty for backup MSS operations. Accordingly, modifying the License in the public interest.

For all of these reasons, Ligado submits that the Commission should grant this application for the modification of the License to reflect the relocation of MSAT-2.

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<sup>3</sup> See 47 C.F.R. § 25.117(c).

