Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Application of KVH Industries, Inc. to	)	
Modify Existing C-band Earth Station	)	Call Sign E120061
Onboard Vessels ("ESV") Blanket	)	File No. SES-MOD-____________
License	)	

APPLICATION FOR LICENSE MODIFICATION

By this application, KVH Industries, Inc. ("KVH") seeks to modify its existing C-band earth station onboard vessel ("ESV") blanket license, Call Sign E120061,[1] by adding an emission designator to its previously licensed TracPhone Model V11 ("V11") ESV terminal and by including authority for the V11 terminal to operate with satellites on the Commission's Permitted Space Station List ("Permitted List").[2]

I. DISCUSSION

Under its current license, KVH is authorized to operate up to 500 V11 terminals to communicate with the INTELSAT 707° at 53 W.L. and INTELSAT POR at 180° E.L., both U.S.-licensed satellites, in the 5.925-6.425 GHz (Earth-to-space) and 3.7-4.2 GHz (space-to-Earth) bands, using various emission designators.[3] Adding the new emission designator and Permitted List authority for the V11 terminal will improve KVH's operational flexibility to provide maritime communications applications to private,

[1] *See* KVH Industries, Inc., Radio Station Authorization, File No. SES-LIC-20120328-00307 (Call Sign E120061) ("C-Band ESV License").

[2] *See* Permitted Space Station List (https://transition.fcc.gov/ib/sd/se/permitted.html).

[3] *See* C-Band ESV License.

commercial, and government vessels operating in U.S. waters and beyond.

KVH will continue to operate the V11 terminal within the off-axis EIRP spectral density limits specified in Section 25.221(a)(1) of the Commission's Rules.[4] KVH incorporates by reference the V11 terminal technical information previously submitted with its original ESV blanket license application.[5] Pursuant to Section 25.117(c) of the Commission's Rules,[6] KVH provides information regarding operational values that have changed in the attached FCC Form 312 and Schedule B. Out of an abundance of caution, KVH also provides herein an updated radiation hazard study.[7] KVH confirms that V11 terminal operations otherwise will be consistent with the terms, conditions and operational parameters that are currently authorized under the C-Band ESV License.

Because the V11 terminals will operate in accordance with the C-band off-axis EIRP spectral mask set forth in Section 25.221(a)(1), grant of Permitted List authority in the requested C-band frequencies is permissible.[8]

The public interest would be served by grant of this modification because it will allow KVH to enhance its operational flexibility and provide improved high-speed satellite broadband services to various U.S. maritime customers. Additionally, because the new emission complies with the Commission's two-degree spacing requirements and other ESV

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[4] 47 C.F.R. § 25.221(a)(1).

[5] *See* Application for ESV Network License (including FCC Form 312 and Technical Appendix), File No. SES-LIC-20120328-00307 (Call Sign E120061).

[6] 47 C.F.R. § 25.117(c).

[7] *See* Exhibit 1.

[8] *See* 47 C.F.R. § 25.221(b)(7).

rules and policies, there is no material potential for interference and granting this authorization is fully consistent with the public interest.

II. CONCLUSION

Based on the foregoing, KVH respectfully request that the Commission grant its request to modify its existing C-Band ESV License, Call Sign E120061, by adding a new emission designator for its previously licensed V11 terminal and by adding authority for the terminal to communicate with the Permitted Space Station List.

EXHIBIT 1

Radiation Hazard Study

Radiation Hazard Analysis
KVH Industries
V11-HTS ESV

This analysis predicts the radiation levels around a proposed earth station complex, comprised of one (reflector) type antennas. This report is developed in accordance with the prediction methods contained in OET Bulletin No. 65, Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields, Edition 97-01, pp 26-30. The maximum level of non-ionizing radiation to which employees may be exposed is limited to a power density level of 5 milliwatts per square centimeter (5 mW/cm^2) averaged over any 6 minute period in a controlled environment and the maximum level of non-ionizing radiation to which the general public is exposed is limited to a power density level of 1 milliwatt per square centimeter (1 mW/cm^2) averaged over any 30 minute period in a uncontrolled environment. Note that the worse-case radiation hazards exist along the beam axis. Under normal circumstances, it is highly unlikely that the antenna axis will be aligned with any occupied area since the antenna will be mounted high on a vessel's superstructure and that would represent pointing toward a vessel deck or towards areas that would block the desired signals, thus rendering the link unusable.

Earth Station Technical Parameter Table

Antenna Actual Diameter	1 meters
Antenna Surface Area	0.8 sq. meters
Antenna Isotropic Gain	34.5 dBi
Number of Identical Adjacent Antennas	1
Nominal Antenna Efficiency (ε)	67.50%
Nominal Frequency	6.138 GHz
Nominal Wavelength (λ)	0.0489 meters
Maximum Transmit Power / Carrier	22.0 Watts
Number of Carriers	1
Total Transmit Power	22.0 Watts
W/G Loss from Transmitter to Feed	1.0 dB
Total Feed Input Power	17.48 Watts
Near Field Limit	$R_{nf} = D^2/4\lambda$ =5.12 meters
Far Field Limit	$R_{ff} = 0.6\ D^2/\lambda$ = 12.28 meters
Transition Region	R_{nf} to R_{ff}

In the following sections, the power density in the above regions, as well as other critically important areas will be calculated and evaluated. The calculations are done in the order discussed in OET Bulletin 65.

1.0 At the Antenna Surface

The power density at the reflector surface can be calculated from the expression:

$PD_{refl} = 4P/A =$ **8.902** mW/cm^2 (1)
Where: P = total power at feed, milliwatts
A = Total area of reflector, sq. cm

In the normal range of transmit powers for satellite antennas, the power densities at or around the reflector surface is expected to exceed safe levels. This area will not be accessible to the general public. Operators and technicians should receive training specifying this area as a high exposure area. Procedures must be established that will assure that all transmitters are rerouted or turned off before access by maintenance personnel to this area is possible.

2.0 On-Axis Near Field Region

The geometrical limits of the radiated power in the near field approximate a cylindrical volume with a diameter equal to that of the antenna. In the near field, the power density is neither uniform nor does its value vary uniformly with distance from the antenna. For the purpose of considering radiation hazard it is assumed that the on-axis flux density is at its maximum value throughout the length of this region. The length of this region, i.e., the distance from the antenna to the end of the near field, is computed as Rnf above.

The maximum power density in the near field is given by:

$PD_{nf} = (16\varepsilon P)/(\pi D^2) =$ **6.009** mW/cm^2 (2)
from 0 to 5.12 meters

Evaluation
Uncontrolled Environment: **Does Not Meet Uncontrolled Limits**
Controlled Environment: **Does not Meet Controlled Limits**

3.0 On-Axis Transition Region

The transition region is located between the near and far field regions. As stated in Bulletin 65, the power density begins to vary inversely with distance in the transition region. The maximum power density in the transition region will not exceed that calculated for the near field region, and the transition region begins at that value. The maximum value for a given distance within the transition region may be computed for the point of interest according to:

$PD_t = (PD_{nf})(R_{nf})/R =$ dependent on R (3)
where: PD_{nf} = near field power density
R_{nf} = near field distance
R = distance to point of interest
For: $5.12 < R < 12.3$ meters

We use Eq (3) to determine the safe on-axis distances required for the two occupancy conditions:

Evaluation

Uncontrolled Environment Safe Operating Distance,(meters), R_{safeu}: 30.7
Controlled Environment Safe Operating Distance,(meters), R_{safec}: 6.1

4.0 On-Axis Far-Field Region

The on- axis power density in the far field region (PD_{ff}) varies inversely with the square of the distance as follows:

PD_{ff} = $PG/(4\pi R^2)$ = dependent on R (4)
where: P = total power at feed
G = Numeric Antenna gain in the direction of interest relative to isotropic radiator
R = distance to the point of interest
For: $R > R_{ff}$ = 12.3 meters
PD_{ff} = **2.574** mW/cm^2 at R_{ff}

We use Eq (4) to determine the safe on-axis distances required for the two occupancy conditions:

Evaluation

Uncontrolled Environment Safe Operating Distance,(meters), R_{safeu} : See Section 3
Controlled Environment Safe Operating Distance,(meters), R_{safec} : See Section 3

5.0 Off-Axis Levels at the FarField Limit and Beyond

In the far field region, the power is distributed in a pattern of maxima and minima (sidelobes) as a function of the off-axis angle between the antenna center line and the point of interest. Off-axis power density in the far field can be estimated using the antenna radiation patterns prescribed for the antenna in use. Usually this will correspond to the antenna gain pattern envelope defined by the FCC or the ITU, which takes the form of:

$G_{off} = 32 - 25\log(\Theta)$
for Θ from 1 to 48 degrees; -10 dBi from 48 to 180 degrees
(Applicable for commonly used satellite transmit antennas)

Considering that satellite antenna beams are aimed skyward, power density in the far field will usually not be a problem except at low look angles. In these cases, the off axis gain reduction may be used to further reduce the power density levels.

For example: At one (1) degree off axis At the far-field limit, we can calculate the power density as:

$G_{off} = 32 - 25\log(1) = 32 - 0$ dBi = 1585 numeric

$PD_{1\ deg\ off\text{-}axis} = PD_{ff} x\ 1585/G$ = **14.629** mW/cm^2 (5)

6.0 Off-Axis power density in the Near Field and Transitional Regions

According to Bulletin 65, off-axis calculations in the near field may be performed as follows: assuming that the point of interest is at least one antenna diameter removed from the center of the main beam, the power density at that point is at least a factor of 100 (20 dB) less than the value calculated for the equivalent on-axis power density in the main beam. Therefore, for regions at least D meters away from the center line of the dish, whether behind, below, or in front under of the antenna's main beam, the power density exposure is at least 20 dB below the main beam level as follows:

$PD_{nf(off\text{-}axis)} = PD_{nf}/100$ = **0.06009** mW/cm^2 at D off axis (6)

See Section 8 for the calculation of the distance vs. elevation angle required to achieve this rule for a given object height.

7.0 Region Between the Feed Horn and Sub-reflector

Transmissions from the feed horn are directed toward the subreflector surface, and are confined within a conical shape defined by the feed horn. The energy between the feed horn and subreflector is conceded to be in excess of any limits for maximum permissible exposure. This area will not be accessible to the general public. Operators and technicians should receive training specifying this area as a high exposure area. Procedures must be established that will assure that all transmitters are rerouted or turned off before access by maintenance personnel to this area is possible.

8.0 Evaluation of Safe Occupancy Area in Front of Antenna

The distance (S) from a vertical axis passing through the dish center to a safe off axis location in front of the antenna can be determined based on the dish diameter rule (Item 6.0). Assuming a flat terrain in front of the antenna, the relationship is:

$S = (D/ \sin \alpha) + (2h - D - 2)/(2 \tan \alpha)$ (7)

Where: α = minimum elevation angle of antenna
D = dish diameter in meters
h = maximum height of object to be cleared, meters

For distances equal or greater than determined by equation (7), the radiation hazard will be below safe levels for all but the most powerful stations (> 4 kilowatts RF at the feed).

For	D =	1 meters
	h =	2.0 meters
Then:		
	α	S
	23	10.0 meters
	25	3.4meters
	30	2.9 meters
	35	2.5 meters
	40	2.2 meters

Suitable barrier and signage should be provided to prevent casual occupancy of the area in front of the antenna within the limits prescribed above at the lowest elevation angle required, although this is highly unlikely given the installation of the antenna high on a vessel's superstructure.

Summary

The earth station site will be protected from uncontrolled access with suitable barriers, signage and personnel instruction. There will also be proper emission warning signs placed and all operating personnel will be aware of the human exposure levels at and around the earth station. The applicant agrees to abide by the conditions specified in Condition 5208 provided below:

Condition 5208 - The licensee shall take all necessary measures to ensure that the antenna 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 wherever such exposures might occur. 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.

The following table summarizes all of the above calculations:

Table - Summary of All RadHaz Parameters				**V11 ESV** (HTS version)
Parameter	Abbr.		Units	Formula
Dish #		Hub		
Antenna Diameter	Df	1	meters	
Antenna Centerline	h	2.0	meters	
Antenna Surface Area	Sa	0.8	$meters^2$	$(\pi * Df^2) / 4$
Antenna Ground Elevation	GE	38.0	meters	
Frequency of Operation	f	6.138	GHz	
Wavelength	λ	0.0489	meters	c / f
HPA Output Power	P_{HPA}	22.0	watts	
HPA to Antenna Loss	L_{tx}	1.0	dB	
Transmit Power at Flange	P	12.4	dBW	$10 * Log(P_{HPA}) - L_{tx}$
		17.48	watts	
Antenna Gain	G_{es}	34.5	dBi	
		2788.8	n/a	
PI	π	3.1415927	n/a	
Antenna Aperture Efficiency	η	67.50%	n/a	$G_{es} / (PI * Df / \lambda)^2$
1. Reflector Surface Region Calculations				
Reflector Surface Power Density	PDas	89.02	W/m^2	$(16 * P)/(\pi * D^2)$
		8.902	mW/cm^2	**Does Not Meet Uncontrolled Limits**
				Does not Meet Controlled Limits
2. On-Axis Near Field Calculations				
Extent of Near Field	Rn	5.12	meters	$D^2 / (4 * \lambda)$
		16.78	feet	
Near Field Power Density	PDnf	60.09	W/m^2	$(16 * \eta * P) / (\pi * D^2)$
		6.009	mW/cm^2	**Does Not Meet Uncontrolled Limits**
				Does not Meet Controlled Limits
3. On-Axis Transition Region Calculations				
Extent of Transition Region (min)	Rtr	5.12	meters	$D^2 / (4 * \lambda)$
Extent of Transition Region (min)		16.78	feet	
Extent of Transition Region (max)	Rtr	12.28	meters	$(0.6 * D^2) / \lambda$
Extent of Transition Region (max)		40.27	feet	
Worst Case Transition Region Power Density	PDtr	60.09	W/m^2	$(16 * \eta * P) / (\pi * D^2)$
		6.009	mW/cm^2	**Does Not Meet Uncontrolled Limits**
				Does not Meet Controlled Limits
Uncontrolled Environment Safe Operating Distar	Rsu	30.7	m	=(PDnf)*(Rnf)/Rsu
Controlled Environment Safe Operating Distance	Rsc	6.1	m	=(PDnf)*(Rnf)/Rsc
4. On-Axis Far Field Calculations				
Distance to the Far Field Region	Rf	12.3	meters	$(0.6 * D^2) / \lambda$
		40.27	feet	
On-Axis Power Density in the Far Field	PDff	25.74	W/m^2	$(G_{es} * P) / (4 * \pi * Rf^2)$
		2.574	mW/cm^2	**Does Not Meet Uncontrolled Limits**
				Meets Controlled Limits
5. Off-Axis Levels at the Far Field Limit and Beyond				
Reflector Surface Power Density	PDs	14.629	W/m^2	$(G_{es} * P) / (4 * \pi * Rf^2)*(Goa/Ges)$
Goa/Ges at example angle θ 1 degree		0.568		Goa = 32 - 25*log(θ)
		1.4629	mW/cm^2	**Meets Controlled Limits**
6. Off-axis Power Density in the Near Field and Transitional Regions Calculations				
Power density 1/100 of Wn for one diameter removed	PDs	0.6009	W/m^2	$((16 * \eta * P) / (\pi * D^2))/100$
		0.06009	mW/cm^2	**Meets Uncontrolled Limits**
8. Off-Axis Safe Distances from Earth Station				S = (D/ sin α) + (2h - D - 2)/(2 tan α)
α = minimum elevation angle of antenna		8.6	deg	
h = maximum height of object to be cleared, meters		2.0	m	
GD = Ground Elevation Delta antenna-obstacle		0.0	m	
elevation angle	8.6	10.0	m	
	25	3.4	m	
	30	2.9	m	
	35	2.5	m	
	40	2.2	m	

Note: Maximum FCC power density limits for 6 GHz is 1 mW/cm^2 for general population/uncontrolled exposure as per FCC OE&T Bulletin No. 65, Edition 97-01 August 1997, Appendix A page 67.