

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Application of NewCom International, Inc.) Call Sign: E050018
to Modify its Fixed Earth Station License)
by Adding New Earth Station Types) File No. SES-MOD-_____

APPLICATION TO MODIFY FIXED EARTH STATION LICENSE

Pursuant to Section 25.117 of the rules of the Federal Communications Commission (the “FCC” or “Commission”), 47 C.F.R. § 25.117, NewCom International, Inc. (“NewCom”) files this application to modify its existing fixed earth station license, Call Sign E050018,¹ by adding three (3) new earth stations for transmit-only operations in the 5.925-6.425 GHz band. NewCom will operate the new earth stations using previously authorized Equivalent Isotropically Radiated Power (“EIRP”) and EIRP Spectral Density (“ESD”) levels. The proposed modification is part of a larger initiative to streamline ground station deployments and will allow Speedcast to provide more effective support services for its U.S. customers and improve the overall quality of service for diverse commercial activities.

I. BACKGROUND

This proposed modification will help facilitate the reorganization of commercial C-band deployments and ground station operations by Speedcast Americas Inc. (“Speedcast”) (NewCom’s parent). This application proposes to add three (3) new earth stations to the existing *Miami Teleport License*: the Intellian V240M, Intellian V240MT and SeaTel 9797B. The Intellian V240M and SeaTel 9797 (the previous version of the 9797B) are currently licensed under an

¹ See NewCom International Inc., File No. SES-MOD-20150421-00249, Call Sign E050018 (“*Miami Teleport License*”). NewCom recently transferred control of the *Miami Teleport License* to Speedcast Americas Inc. (See File No. SES-T/C-20160121-00093).

existing Speedcast authorization, Call Sign E090176,² and NewCom will operate the earth stations here pursuant the parameters authorized in that license. Moreover, the V240MT³ will operate in the C-band using the same EIRP and ESD levels that are currently authorized for the V240M in the *Speedcast ESV License* (which are lower than the licensed power levels in the *Miami Teleport License*). No other information in the *Miami Teleport License* is changing as a result of this modification.

As demonstrated below, operation of the additional earth stations will be fully consistent with the Commission's spectrum management policies, including two-degree satellite spacing, and will not adversely affect the operations of other spectrum users. In the FCC Form 312 Schedule B and Technical Appendix, NewCom provides relevant information relating to the proposed operations, including the C-band transmit frequencies and power levels, radiation hazard analyses⁴ and frequency coordination reports.

II. DISCUSSION

NewCom's proposed operation of the new earth stations will not fundamentally alter what is authorized at the Miami teleport. As a means to eliminate the potential for increased interference, NewCom will operate the new earth stations at EIRP and ESD levels below those currently authorized in the *Miami Teleport License*. In addition, NewCom does not seek authority

² See Speedcast Communications Inc., File No. SES-MOD-20151210-00928, Call Sign E090176 ("*Speedcast ESV License*").

³ The V240MT is the tri-band iteration of the V240M antenna, and operates with a slightly lower gain than the V240M. Here, Speedcast seeks to operate the V240MT in conventional C-band transmit frequencies only.

⁴ NewCom provides a radiation hazard analysis for the SeaTel 9797, which is the previous version of the SeaTel 9797B antenna. The antennas are fundamentally identical (the SeaTel 9797B has a slightly lower gain) and the radiation hazard analysis remains accurate. In addition, the V240M radiation hazard study was conducted using worst-case scenario power levels and, in reality, NewCom will operate the antenna at a significantly lower input power (see FCC Form 312 Schedule B).

to operate in C-band receive frequencies. As the Commission is aware, effective as of April 19, 2018, the Commission released a Public Notice placing a temporary freeze on the filing of all new or modification applications for earth stations in the 3.7-4.2 GHz band.⁵ Accordingly, NewCom does not seek to license receive operations in the 3.7-4.2 GHz band and understands that it will receive no protection for its C-band receive operations. NewCom agrees to operate on an unprotected, non-interference basis at all times in the 3.7-4.2 GHz band to ensure that NewCom remains compliant with the Commission's C-band receive freeze. Still, out of an abundance of caution, NewCom has coordinated conventional C-band receive frequencies for each new antenna.

A. Frequency Coordination

NewCom engaged Comsearch to perform frequency coordination analysis for each new earth station, which was completed on January 24, 2019. Pursuant to Sections 25.115(c)(2)(ii) and 25.203 of the Commission's rules, 47 C.F.R. §§ 25.115(c)(2)(ii) and 25.203, Comsearch has conducted a coordination analysis on behalf of NewCom that considers all existing, proposed and prior coordinated microwave facilities within the contours of the earth stations at the Miami teleport.

As demonstrated in the attached frequency coordination reports, there is no potential for interference between other users of the C-band spectrum and the operations of the V240M, V240MT and SeaTel 9797B at the Miami facility, and NewCom's proposed operations are fully compatible with other FCC-licensed operations in the band. All potential interference cases that were identified by current licensees have been resolved, and Comsearch has concluded that each site will operate satisfactorily with the common carrier microwave environment. NewCom will

⁵ See Public Notice, *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band, 90-Day Window to File Applications for Earth Stations Currently Operating in the 3.7-4.2 GHz Band*, DA 18-398 (rel. on April 19, 2018) ("*Temporary Freeze Public Notice*").

coordinate any additional hub operations prior to bringing them into operation under the *Miami Teleport License*.

B. Public Interest

The addition of the new earth stations at the Miami teleport will serve the public interest by allowing NewCom and Speedcast to restructure its ground station operations to provide more efficient services to its customers. This, in turn, will facilitate improved satellite services to companies and personnel in industries that rely on satellite connectivity for critical operational and employee support at remote locations that may be unable to obtain communications services through alternative facilities. Moreover, adding the V240M, V240MT and SeaTel 9797 to the *Miami Teleport License* will allow NewCom to provide more flexible services to its customers in the United States by accelerating its ability to troubleshoot and resolve network or equipment issues. In addition, operation of the new earth stations will be fully consistent with the Commission's spectrum management policies, including two-degree satellite spacing, and will not adversely affect the operations of other spectrum users.

III. CONCLUSION

Based on the foregoing, NewCom respectfully requests that the Commission grant this modification application to add three (3) new earth stations at the Miami teleport – the Intellian V240M, Intellian V240MT and SeaTel 9797B – for conventional C-band transmit operations.