

## **Haras Development**

E181423

Request for Modification

On September 11, 2019, the FCC granted Haras Development (“Haras”) authority to operate a fixed earth station located in Dublin, Ohio (the “Dublin Earth Station”; Call Sign E181423) utilizing certain X-band downlink frequencies to communicate with the DigitalGlobe (Call Signs S2129 and S2348) (“DigitalGlobe”) and BlackSky Global satellites (Call Sign S3032).<sup>1</sup> On October 21, 2019 Haras filed a modification to add points of communication, S-band uplink emissions, and a second pair of electrically-identical antennas.<sup>2</sup> Haras currently operates the second pair of electrically-identical antennas pursuant to special temporary authority.<sup>3</sup>

By this modification application, Haras seeks authority to transmit low-power emissions towards low earth orbit without a recipient space station on a non-interference, non-protected basis. As discussed with International Bureau staff, Haras will conduct long-term, intermittent, low-powered emission tests towards low earth orbit using the 2052.00 MHz frequency at 20W. These operations will not interfere with on-going operations in low earth orbit. Haras will immediately cease testing upon any reports from other operators of harmful interference into satellite receivers until an acceptable mitigation solution can be achieved.

In accordance with the Commission’s rules, Haras has filed the technical information relating to the proposed modification in Schedule B.<sup>4</sup> As previously discussed with International Bureau staff, the electronic Schedule B requires the selection of a point of communication to validate the form and file the application. In order to complete this modification application, Haras has selected the DigitalGlobe WorldView-4 satellite as a point of communication; however, the emissions applied for in this modification will not actually be transmitted to or received by DigitalGlobe WorldView-4.

For the reasons set forth above, Haras respectfully requests that the Commission grant this modification application.

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<sup>1</sup> See SES-LIC-20180816-02287 and SES-AMD-20181219-03513 (granted Sep. 11, 2019).

<sup>2</sup> See SES-MOD-20191021-01351 (filed Oct. 21, 2019).

<sup>3</sup> See SES-STA-20191022-01358 (granted Dec. 4, 2019); *see also* SES-STA-20191220-01751 (filed Dec. 20, 2019).

<sup>4</sup> 47 C.F.R. § 25.115.