

ATTACHMENT

Description of Application for Modification of License

1.0 OVERVIEW

Anuvu Licensing Holdings LLC (“Anuvu”) seeks modification of its Ku-band Earth Stations Aboard Aircraft (“ESAA”) license (Call Sign E080100) for the purpose of adding additional satellite points of communication to its existing authority. The additional satellite facilities to which Anuvu seeks access are:

- Spacing Guild UK Limited (Astranis) NuView Alpha (Call Sign S3150) at 83.1° W.L.
- Spacing Guild UK Limited (Astranis) NuView Bravo (Call Sign S3151) at 83.1° W.L.
- Intelsat Galaxy 3C (Call Sign S2381) at 95.05° W.L.
- Intelsat Galaxy 17 (Call Sign S2715) at 85.0° W.L.
- Intelsat 23 (Call Sign S2831) at 53.0° W.L.
- Intelsat 902 (Call Sign S2406) at 50.1° W.L.
- SES AMC-6 (Call Sign S2347) at 139.0° W.L.
- SES SES-3 (Call Sign S2892) at 103.0° W.L.
- Telesat ANIK-F3 (Call Sign S2703) at 118.7° W.L.
- Telesat ANIK-F2 (Call Sign S2472) at 111.1° W.L.

Anuvu seeks this modification subject to all terms and conditions set forth in its current license¹ and the operations proposed are otherwise consistent with the technical specifications set forth in its license. Operations using the additional satellites would use both the TECOM Ku-Stream (SAA/Remote 2) and QUEST Q050000 (GSAA/Remote 3) antennas. The Form 312, Schedule B associated with this filing reflects only the additional points of communication and does not recapitulate all technical data contained in its current license, which should remain unchanged.

In addition, Anuvu takes this opportunity to update the contact information for this license due to a personnel change in March. The contact point for these facilities is now its Lombard Network Operations Center, which is reachable via a toll-free telephone number, 1-866-824-0122, or on an international line at 1-331-462-1800, or by email at LOM.NOC@anuvu.com. All other existing information contained in the current license should be carried forward to the license as modified.

2.0 ADDITIONAL POINTS OF COMMUNICATION REQUESTED

Anuvu requests the addition of each of the requested satellites to provide expanded coverage and capacity for the geographic locations described below. Complete technical information regarding each of the satellites is already a matter of record before the FCC, either in applications pending with the Space Bureau or in the records of satellites included in the Space Bureau’s Approved Space

¹ See Call Sign E080100, FCC File No. SES-MOD-20221221-01564 (renewal pending in FCC File No. SES-RWL-20240618-01243).

Station List. *See* Spacing Guild UK Limited (a subsidiary of Astranis), ICFS File Nos. SAT-PDR-20220823-00093 (as amended by SAT-APL-20241218-00287) and SAT-PDR-20220823-00094 (as amended by SAT-APL-20241218-00286); Intelsat satellites Galaxy 3C, ICFS File No. SAT-MOD-20170523-00077 (as amended by SAT-AMD-20170613-00089); Galaxy 17, ICFS File No. SAT-MOD-20220523-00053 (as amended by SAT-AMD-20230519-00118; Intelsat 23, ICFS File No. SAT-LOA-20110727-00139; Intelsat 902, ICFS File No. SAT-MOD-20200326-00028; SES satellites AMC-6, ICFS File No. SAT-MOD-20230927-00235, and SES-3, ICFS File No. SAT-RPL-20121228-00227 (as amended by SAT-AMD-20131113-00132); and Telesat satellites ANIK-F2, ICFS File Nos. SAT-PPL-20041004-00194 and SAT-PDR-20020321-00027, and ANIK-F3, ICFS File No. SAT-PPL-20060516-00061 (as amended by SAT-APL-20111117-00222). Anuvu therefore simply requests that its existing ESAA license be updated to reflect use of these space facilities on a primary basis for ESAA transmit operations in the 14.05-14.47 GHz band.

The addition to the Anuvu license of authority to communicate using the requested satellites will provide additional near-term space segment capacity for Anuvu's ESAA network, thereby allowing it to provide continued and expanded throughput and coverage for the provision of its in-flight Wi-Fi connectivity services to airline passengers on flights operating throughout the contiguous United States, on transoceanic routes and in the Caribbean. This capacity is immediately available for use, and Anuvu therefore seeks modification of its authority as quickly as possible and intends to seek special temporary to expedite use of the capacity, which will serve the public interest by allowing improved service to airline passengers in the near term.

3.0 COORDINATION CERTIFICATIONS FROM SATELLITE OPERATORS [47 C.F.R. §§ 25.228(a) & 25.220(d)]

Anuvu's intended operations are within the scope of use that each satellite operator has coordinated with the other satellite operators within six degrees adjacent to each satellite in either direction along the geostationary arc and should not cause harmful interference to any of these satellites operating in accordance with FCC's two-degree spacing policy. Exhibit A attached hereto provides copies of the coordination certification letters from Intelsat, SES and Telesat covering Anuvu's proposed operations. The application will be supplemented to provide similar documentation from Astranis at a later date.

In the event that a new Ku-band NGSO FSS system is launched in the future, Anuvu would enter into coordination with the NGSO FSS system operator to establish operating parameters that permit successful co-frequency sharing and would modify its operations as necessary to implement any coordination agreement reached. Anuvu acknowledges that the Commission may condition the grant of any modified license issued to it upon a requirement that it complete such coordination at the appropriate time.

4.0 TECHNICAL DATA AND PREDICTED COVERAGE AREA [47 C.F.R. § 25.227(b)(4)]

Exhibit B attached hereto includes illustrations detailing the geographic coverage contours for operations using each satellite to be added to the Anuvu ESAA license.

5.0 REVISED SPACECRAFT, FREQUENCY & BEAM COVERAGE

**Table 1a: Spacecraft, Frequency & Beam Coverage Table
(U.S. Licensed Satellites)**

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Satellite Operator
Echostar 9	121° W	North America and Caribbean	14.05-14.47	11.7-12.2	Echostar
AMC-1	130.9 W	North America, Central America, and Pacific	14.05-14.47	11.7-12.2	SES
AMC-2	84.85 W	North America, Caribbean and North Atlantic	14.05-14.47	11.7-12.2	
AMC-3	72.0 W	North America, Central America, Atlantic and Caribbean	14.05-14.47	11.7-12.2	
AMC-6	139.0 W	North America, Central America, Caribbean and Pacific	14.05-14.47	11.5-12.2	
AMC-9	83.0 W	North America, Caribbean, Central America and North Atlantic	14.05-14.47	11.7-12.2	
SES-1	101.0 W	North America, Central America, Pacific and Caribbean	14.05-14.47	11.7-12.2	
SES-3	103.0 W	North America	14.05-14.47	11.7-12.2	
SES-10	67.0W	North America, Central America, South Atlantic and Caribbean	14.05-14.47	11.7-12.2	
SES-15	129.0 W	North America, Central America, Caribbean, and Pacific	14.05-14.47	10.7-10.95, 10.95-11.2, 11.2-11.45, 11.45-11.7, 11.7-12.2	

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Satellite Operator
Galaxy 3C	95.05 W	North America, Central America, Pacific and Caribbean	14.05-14.47	11.7-12.2	Intelsat
Galaxy 17	85.0 W	North America, Central America, Pacific and Caribbean	14.05-14.47	11.7-12.2	
Intelsat 23	53.0 W	North America, Central America and Caribbean	14.05-14.47	11.45-12.2	
Intelsat 902	50.1 W	North America	14.05-14.47	10.95-11.2 11.45-11.7	

= Point of Communication Added in this Application

**Table 1b: Spacecraft, Frequency & Beam Coverage Table
(Non-U.S., Permitted List Satellite)**

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Satellite Operator
Anik-F1R	107.3 W	North America, Gulf of Mexico, and Caribbean	14.05-14.47	11.7-12.2	Telesat
Anik-F1	109.2 W	North America, Gulf of Mexico, and Caribbean	14.05-14.47	11.7-12.2	
Anik-F2	111.1 W	North America	14.05-14.47	11.7-12.2	
Anik-F3	118.7 W	North America	14.05-14.47	11.7-12.2	
Eutelsat 115 WB	114.9 W	North America, North Atlantic and Pacific Ocean	14.05-14.47	11.7-12.2	Eutelsat
Eutelsat 139 WA	139 W	North America and Pacific Ocean	14.05-14.47	10.95-11.2, 11.45-11.7, 12.5-12.75	
Horizons 2	73.8 W	North America, Atlantic Ocean, and Caribbean	14.05-14.47	11.7-12.2	Intelsat
NuView Alpha NuView Bravo	83.1 W	North America, Caribbean, Central America	14.05-14.47	10.95-11.2 11.7-12.2	Astranis

= Point of Communication Added in this Application

6.0 TELEPORT UPLINK LOCATIONS

Table 2: Teleport Locations for Provision of Service within the United States

Satellite	Orbital Location	Teleport Location(s)	Site Operator	Call Sign(s)
AMC-1	130.9 W	Holmdel, NJ	Anuvu	E160163
AMC-2	80.85W	N. Las Vegas, NV	Hughes	E940460
AMC-3	72.0 W	Holmdel, NJ	Anuvu	E160163
AMC-6	139.0 W	Haleiwa, HI	SES	E190489
AMC-9	83.0W	North Las Vegas, NV	Hughes	E940460
SES-1	101.0W	North Las Vegas, NV	Hughes	E940460
SES-10	67.0W	South Mountain, CA	SES	E170139
SES-15	129.0 W	South Mountain, CA	SES	E160022
NuView Alpha* NuView Bravo*	83.1 W	Calgary and Allan Park, Canada	Telesat	Canadian Licensed
Galaxy 3C	95.05 W	Holmdel, NJ	Anuvu	E160163
Galaxy 17	85.0 W	Atlanta, GA	Lumen	E000358
Intelsat 23	53.0 W	Atlanta, GA	Lumen	E850041
Intelsat 902	50.1 W	Holmdel, NJ	Anuvu	E070218
SES-3	103.0 W	Brewster, WA	USEI	E120128

Satellite	Orbital Location	Teleport Location(s)	Site Operator	Call Sign(s)
ANIK-F3*	118.7 W	Brewster, WA	USEI	E060416
ANIK-F2*	111.1 W	Mount Jackson, VA	Telesat	KA399
Anik-F1R	107.3 W	Holmdel, NJ	Anuvu	E070218
Anik-F1	109.2W	Atlanta, GA	Lumen	E850041
Echostar 9	121 W	Atlanta, GA	Lumen	E850041
Eutelsat 115 WB*	114.9W	Southfield (Detroit), MI	Hughes	E990170
Eutelsat 139 WA*	139 W	Brewster, WA	USEI	E960222
Horizons 2	73.8 W	Atlanta, GA	Lumen	E850041

* = Non-U.S.-licensed satellite included on Ku-band Permitted List

= Point of Communication Added in this Application

7.0 LICENSEE CERTIFICATION

I, Timothy Southard, Vice President, Networks, of Anuvu Licensing Holdings LLC hereby certify that Anuvu:

- (1) will continue to comply with the requirements of Section 25.228 of the Commission's Rules and the conditions of its existing license; and
- (2) has confirmed, as shown by the coordination certification letters submitted with this application, that the ESAA operations proposed herein are within coordinated parameters for adjacent satellites up to 6 degrees away on the geostationary arc from each new satellite requested.

s/ Timothy Southard

Timothy Southard
Vice President, Networks
Anuvu

April 17, 2025

EXHIBIT A

Satellite Operator Coordination Letters From Intelsat, SES and Telesat



2 April 2025

Federal Communications Commission
International Bureau
445 12th Street, SW
Washington, DC 20554

Re: Anuvu Licensing Holdings LLC – Application for Modification of License (Call Sign E080100) to add multiple Intelsat satellites as a point of communication

To whom it may concern

Intelsat is aware that Anuvu Licensing Holdings LLC is seeking to modify its current authorization to add Galaxy 3C (S2381), Intelsat 902 (S2406), Galaxy 17 (S2715) and Intelsat 23 (S2831) as points of communication for its earth station aboard aircraft ("ESAA") license from the Federal Communication Commission ("FCC"), Call Sign E080100 and hereby confirms support for grant of the above reference modification application by Anuvu Licensing Holdings LLC.

Intelsat certifies that the use of ESAA terminals will be in accordance with the Intelsat license, including conditions on the grants, and existing coordination agreements with adjacent satellite operators within +/-6 degrees of the above-mentioned Intelsat satellites.

In view of the above, the public interest would be served by grant of the Anuvu Licensing Holdings LLC modification application at the earliest practical time.

Sincerely,

Giselle Creeser

Giselle Creeser
Director Spectrum Engineering
giselle.creeser@intelsat.com

Intelsat US LLC

7900 Tysons One Place, McLean, VA 22102-5972 USA | T +1 703-559-6800 | www.intelsat.com



Frederic Portier
Senior Manager, Spectrum Management & Development, Americas

Federal Communications Commission
International Bureau
445 12th Street, S.W.
Washington, D.C. 20554

14 April 2025

Subject: Anuvu Licensing Holdings LLC – Application for Modification of License (Call Sign E080100)
to add AMC-6 at 135°WL as a point of communication

To whom it may concern,

This letter confirms that SES is aware that Anuvu Licensing Holdings LLC is seeking to modify its current authorization to add AMC-6 at 135°WL (S2347) as a point of communication for its earth station aboard aircraft ("ESAA") license from the Federal Communication Commission ("FCC"), Call Sign E080100 and hereby confirms support for grant of the above reference modification application by Anuvu Licensing Holdings LLC.

Based upon the representations made to SES by Anuvu concerning how it will operate on AMC-6:

- SES certifies that it has completed coordination as required under the FCC's rules and that the power density levels specified by Anuvu are consistent with any existing coordination agreements to which SES is a party with adjacent satellite operators within +/- 6 degrees of orbital separation from AMC-6.
- If the FCC authorizes the operations proposed by Anuvu, SES will include the power density levels specified by Anuvu in all future satellite network coordination with other operators of satellites adjacent to AMC-6.

Yours Sincerely,

Frederic Portier

Frederic Portier



Frederic Portier
Senior Manager, Spectrum Management & Development, Americas

Federal Communications Commission
International Bureau
445 12th Street, S.W.
Washington, D.C. 20554

14 April 2025

Subject: Anuvu Licensing Holdings LLC – Application for Modification of License (Call Sign E080100)
to add SES-3 at 103°WL as a point of communication

To whom it may concern,

This letter confirms that SES is aware that Anuvu Licensing Holdings LLC is seeking to modify its current authorization to add SES-3 at 103°WL (S2892) as a point of communication for its earth station aboard aircraft ("ESAA") license from the Federal Communication Commission ("FCC"), Call Sign E080100 and hereby confirms support for grant of the above reference modification application by Anuvu Licensing Holdings LLC.

Based upon the representations made to SES by Anuvu concerning how it will operate on SES-3:

- SES certifies that it has completed coordination as required under the FCC's rules and that the power density levels specified by Anuvu are consistent with any existing coordination agreements to which SES is a party with adjacent satellite operators within +/- 6 degrees of orbital separation from SES-3.
- If the FCC authorizes the operations proposed by Anuvu, SES will include the power density levels specified by Anuvu in all future satellite network coordination with other operators of satellites adjacent to SES-3.

Yours Sincerely,

Frederic Portier

Frederic Portier



160 Elgin Street, Suite 2100
Ottawa, ON, Canada K2P 2P7

3 April 2025

Federal Communications Commission
International Bureau, 445 12th Street SW
Washington, D.C. 20554

Re: Engineering Certification of Telesat for Anuvu Licensing Holdings LLC with regard to its Application for Modification of License (Call Sign E080100) to add Anik F2 satellite at 111.1° WL as a point of communication

To Whom It May Concern:

This letter certifies that Telesat is aware that Anuvu Licensing Holdings LLC ("Anuvu") is seeking to modify its current authorization to add Anik F2 satellite at 111.1° WL as a point of communication for its Ku-band earth station aboard aircraft ("ESAA") license from the Federal Communications Commission ("FCC"), Call Sign E080100, and Telesat confirms support for the grant of the above reference modification application by Anuvu.

Telesat certifies that the proposed operation of the Anuvu Ku-band ESAA terminals at the power density levels provided to Telesat is consistent with the existing coordination agreements with the adjacent satellites within +/- 6 degrees of Anik F2 orbital location. Telesat also certifies that the use of the Anuvu Ku-band ESAA terminals will be consistent with the conditions of the FCC grant for Anik F2 satellite operations at 111.1° WL (call sign S2472).

Sincerely Yours,

A handwritten signature in black ink, appearing to be "B. Borna", enclosed within a large, loopy circular stroke.

BAHRAM BORNA
Systems Engineering Specialist
Telesat



160 Elgin Street, Suite 2100
Ottawa, ON, Canada K2P 2P7

3 April 2025

Federal Communications Commission
International Bureau, 445 12th Street SW
Washington, D.C. 20554

Re: Engineering Certification of Telesat for Anuvu Licensing Holdings LLC with regard to its Application for Modification of License (Call Sign E080100) to add Anik F3 satellite at 118.7° WL as a point of communication

To Whom It May Concern:

This letter certifies that Telesat is aware that Anuvu Licensing Holdings LLC ("Anuvu") is seeking to modify its current authorization to add Anik F3 satellite at 118.7° WL as a point of communication for its Ku-band earth station aboard aircraft ("ESAA") license from the Federal Communications Commission ("FCC"), Call Sign E080100, and Telesat confirms support for the grant of the above reference modification application by Anuvu.

Telesat certifies that the proposed operation of the Anuvu Ku-band ESAA terminals at the power density levels provided to Telesat is consistent with the existing coordination agreements with the adjacent satellites within +/- 6 degrees of Anik F3 orbital location. Telesat also certifies that the use of the Anuvu Ku-band ESAA terminals will be consistent with the conditions of the FCC grant for Anik F3 satellite operations at 118.7° WL (call sign S2703).

Sincerely Yours,

A handwritten signature in black ink, appearing to be "B. Borna", enclosed within a large, loopy circular flourish.

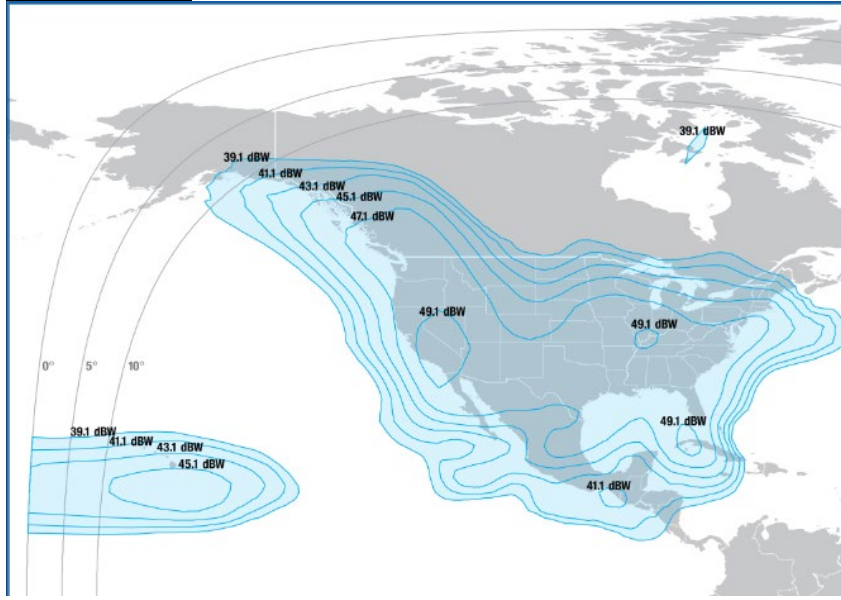
BAHRAM BORNA
Systems Engineering Specialist
Telesat

EXHIBIT B

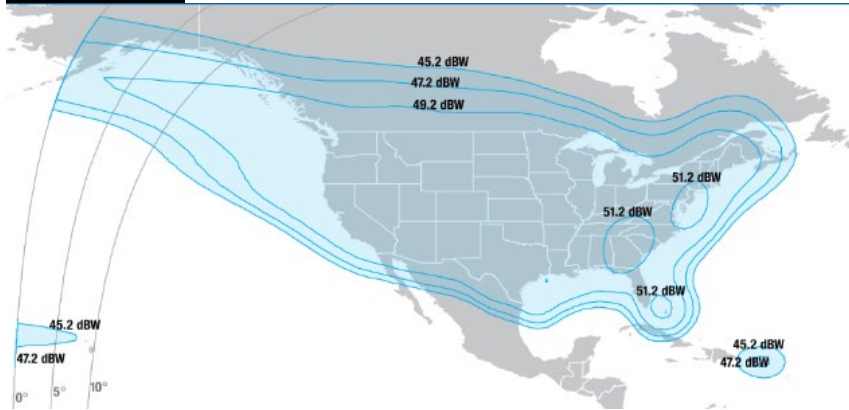
Satellite Coverage Contours

Intelsat

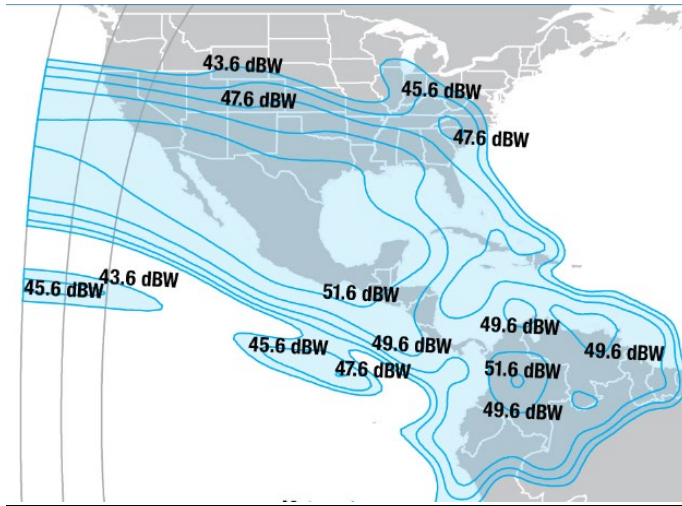
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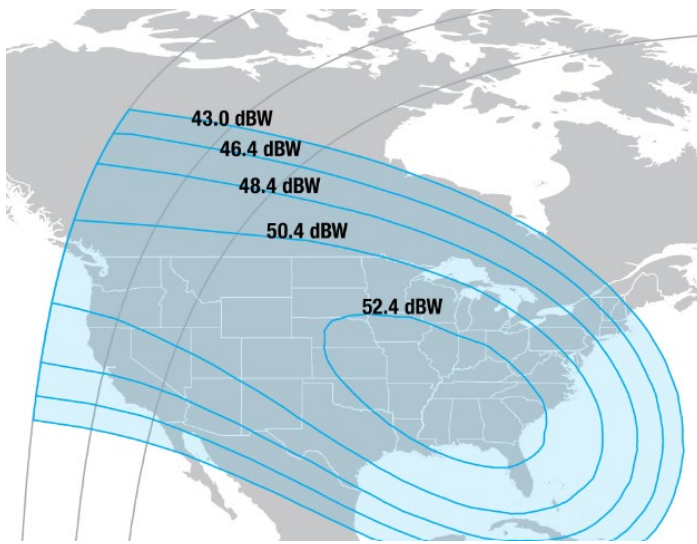
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INTELSAT 23

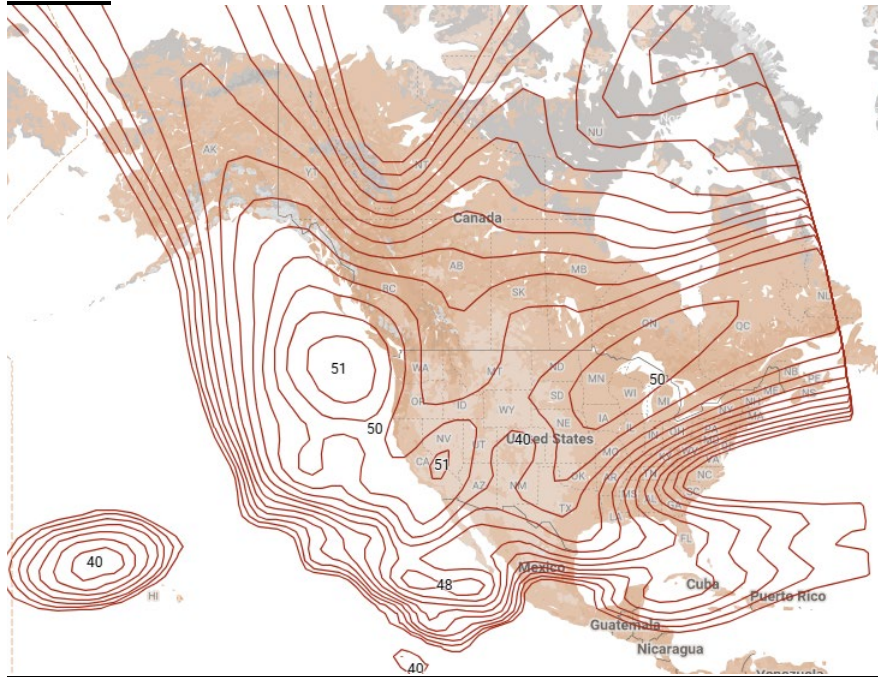


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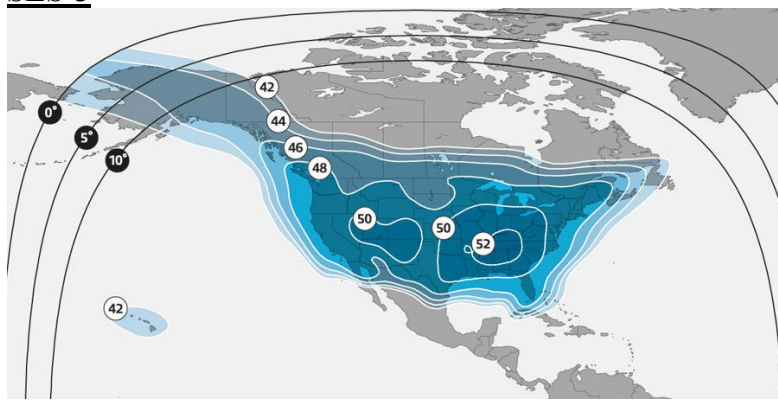


SES

AMC-6

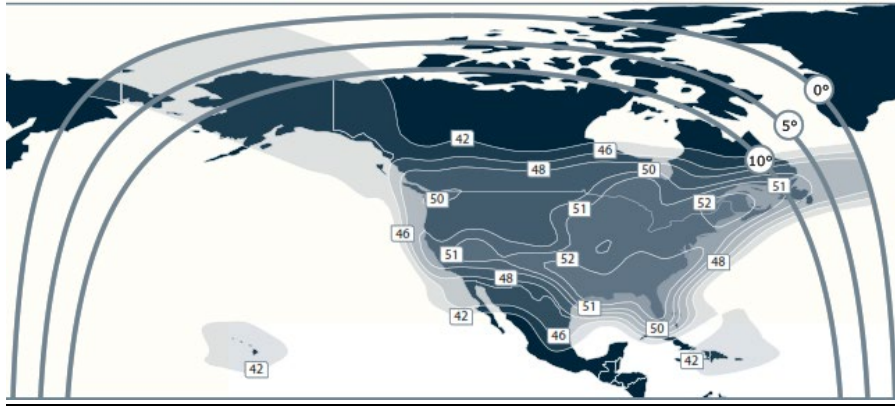


SES-3

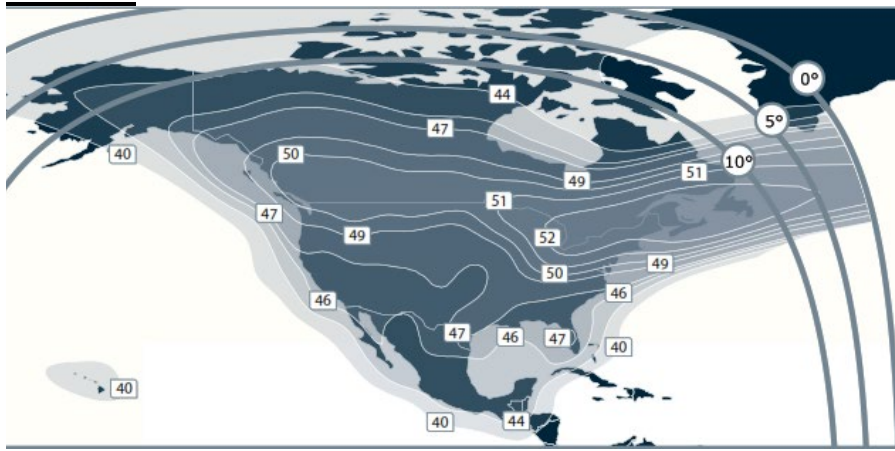


Telesat

ANIK-F3

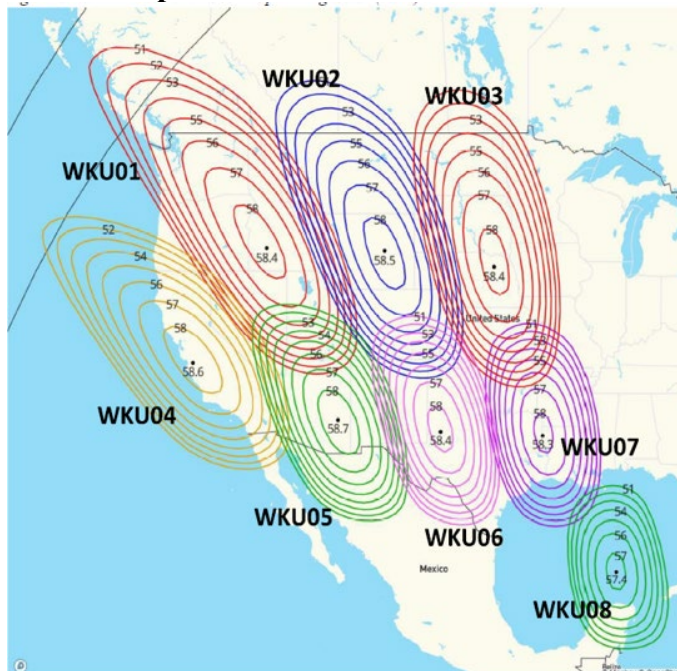


ANIK-F2



Astranis

NuView Alpha



NuView Bravo

