

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

In the Matter of )  
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Application of Speedcast Coommunications ) Call Sign E030170  
Inc. to Modify a Fixed Earth Station License )  
by Adding New Ku-band Earth Stations ) 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, Speedcast Communications Inc. (“Speedcast”) files this application to modify its existing fixed earth station license, Call Sign E030170,<sup>1</sup> by adding two (2) earth stations – the 3.8m Prodelin antenna (“the 3.8m Prodelin”), and the 3.7m Andrew antenna (“the 3.7m Andrew”) – for operation in conventional Ku-band frequencies from 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) bands. Speedcast will utilize the 3.7m Andrew for receive-only operations, and will operate the 3.8m Prodelin using Equivalent Isotropically Radiated Power (“EIRP”) levels identical to those previously authorized by the Commisison.

This modification of the *Houston Teleport License* is part of an initiative by Speedcast to streamline its ground station deployments throughout the country. Pursuant to Section 25.117(c) of the Commission’s rules, 47 C.F.R. § 25.117(c), Speedcast provides herewith the FCC Form 312, Schedule B, and Technical Appendix showing the required technical information pertaining to the requested modification.

**I. BACKGROUND**

Speedcast is currently reorganizing and streamlining its commercial C-band and Ku-band deployments and ground station operations across the U.S., including an application recently

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<sup>1</sup> See Speedcast Communications Inc., File No. SES-RWL-20180919-02780, Call Sign E030170 (“*Houston Teleport License*”). Speedcast Communications Inc. is a wholly-owned subsidiary of Speedcast Americas Inc.

filed by its affiliate, NewCom International, Inc., to modify its *Miami Teleport License* to replace a 7.3-meter C-band earth station with a 7.6-meter version.<sup>2</sup> In this application, Speedcast proposes to modify its *Houston Teleport License* to add two new Ku-band antennas, which will better support customer needs at that location and which will allow Speedcast to provide more efficient and flexible services to its customers in the United States.

Speedcast will operate the 3.8m Prodelin and the 3.7m Andrew earth stations in a manner that is consistent with Section 25.212 of the Commission's rules, 47 C.F.R. § 25.212. In the FCC Form 312 Schedule B and Technical Appendix, Speedcast provides relevant information relating to the proposed operations, including the specific Ku-band frequencies and power levels.

## I. DISCUSSION

Speedcast seeks to operate the 3.7m Andrew and 3.8m Prodelin earth stations with any U.S.-licensed or non-U.S. licensed satellite on the Commission's Ku-band Permitted Space Station List. The Commission has previously authorized the 3.8m Prodelin antenna model for fixed earth station operations, including with the identical operating parameters proposed herein.<sup>3</sup> Moreover, Speedcast seeks to license the 3.7m Andrew only for receive operations.

At all times, Speedcast will operate the 3.8m Prodelin earth station consistent with these previously-authorized power levels and in compliance with the relevant EIRP spectral density masks in Sections 25.218(f) of the Commission's rules.<sup>4</sup> Therefore, this modification application is eligible for routine processing under the Commission's rules. Speedcast provides

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<sup>2</sup> See NewCom International Inc., File No. SES-MOD-20181017-03612, Call Sign E040267 ("*Miami Teleport License*"). NewCom International Inc. is a wholly-owned subsidiary of Speedcast Americas Inc.

<sup>3</sup> See Speedcast Communications Inc., File No. SES-MOD-20150421-00249, Call Sign E050018.

<sup>4</sup> Speedcast notes that the 3.8m Prodelin earth station approved under Call Sign E050018 utilizes the same Prodelin 1383 antenna sought herein. The Prodelin 1383 is on the Commission's Approved Non-Routine Earth Station Antennas List (see Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>).

the FCC Form 312 Schedule B for information relating to the proposed earth station operations and radiation hazard analyses for each antenna. Because the antennae will be located in an established “antenna farm,” this application is categorically exempt from the Commission’s rules requiring environmental impact review.<sup>5</sup>

The addition of the 3.7m Andrew and 3.8m Prodelin antennas to the *Houston Teleport License* will serve the public interest by allowing Speedcast to provide more efficient and flexible services to its customers in the United States. 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. This modification will also allow Speedcast to restructure its ground station operations to facilitate improved satellite services to companies and personnel in remote location industries that rely on satellite connectivity for critical operational support.

#### **A. CONCLUSION**

Based on the foregoing, Speedcast respectfully requests that the Commission grant this modification application to add two (2) earth stations, the 3.8m Prodelin and the 3.7m Andrew, to the *Houston Teleport License* for conventional Ku-band operations as described herein.

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<sup>5</sup> 47 C.F.R. § 1.1306, Note 3 (Note 3 (“The construction of an antenna tower or supporting structure in an established ‘antenna farm’: (*i.e.*, an area in which similar antenna towers are clustered, whether or not such area has been officially designated as an antenna farm), will be categorically excluded unless one or more of the antennas to be mounted on the tower or structure are subject to the provisions of §1.1307(b) and the additional radiofrequency radiation from the antenna(s) on the new tower or structure would cause human exposure in excess of the applicable health and safety guidelines cited in §1.1307(b).”).