

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

In the Matter of

Application of Speedcast Communications Inc. to Modify its Existing Very Small Aperture Terminal (“VSAT”) Blanket License)	Call Sign: E910609
)	File No. SES-MOD-_____

APPLICATION TO MODIFY VSAT BLANKET LICENSE

By this application, Speedcast Communications Inc. (“Speedcast”) respectfully seeks to modify¹ its existing very small aperture terminal (“VSAT”) blanket license, Call Sign E910609,² by adding authority to operate five (5) new VSAT remotes (the “New VSAT Remotes”), identified below, in conventional Ku-band frequencies from 11.7-12.2 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space) bands. Speedcast also seeks to operate one of the New VSAT Remotes in conventional Ka-band frequencies from 18.3-18.8 GHz (space-to-Earth), 19.7-20.2 GHz (space-to-Earth), 28.35-28.6 GHz (Earth-to-space) and 29.3-30.0 GHz (Earth-to-space). Speedcast seeks to operate up to ten (10) of each of the New VSAT Remotes at fixed locations within the United States with any U.S.-licensed or non-U.S. licensed satellite on the Commission’s Ku-band Permitted Space Station List and Ka-band Permitted Space Station List.

Speedcast seeks to operate the New VSAT Remotes in the contiguous United States (“CONUS”), Alaska, Hawaii, and U.S. Territories³, as well as expand the area of operations for all remotes in the *VSAT Blanket License* to include Alaska, Hawaii, and U.S. Territories

¹ Based on consultation with Commission staff, Speedcast is withdrawing its pending modification application, File No. SES-MOD 20190225-00191, and hereby submits this application in its place. Speedcast understands that this approach will help expedite Commission review and processing of this application.

² See Speedcast Communications Inc., File No. SES-RWL-20110901-01016, Call Sign E910609 (“*VSAT Blanket License*”).

³ Speedcast intends the term “U.S. Territories” to encompass Puerto Rico, the U.S. Virgin Islands, Guam, the Commonwealth of the Northern Mariana Islands, and American Samoa.

(Speedcast's existing authority is limited to CONUS). Grant of this application will allow Speedcast to provide more effective and flexible support services for its U.S. customers, as well as to expand its network and provide broadband connectivity to all regions of the United States, improving the overall quality of service for various commercial activities.

I. DISCUSSION

Speedcast seeks to operate the following New VSAT Remotes under the *VSAT Blanket License*:

- 2.4m Intellian V240M (Ku-band only);
- 2.4m Intellian V240MT (Ku-band and Ka-band);⁴
- 1.0m Sailor 900 (Ku-band only);⁵
- 1.5m SeaTel 6009 (Ku-band only); and
- 2.4m Spacetrack 4024 (Ku-band only).

The Commission has previously authorized each New VSAT Remote for earth station operations, and the operating parameters proposed herein are consistent with those previously approved power level.⁶ In the Ku-band, Speedcast will operate the New VSAT Remotes using the identical previously authorized power levels in the *ITC Global License* and *Speedcast ESV License*, as

⁴ The V240MT is the tri-band iteration of the V240M antenna and operates at slightly lower gain than the V240M. In the FCC Form Schedule B, Speedcast provides separate entries for Ku-band and Ka-band V240MT operations to provide band-specific operational parameters.

⁵ The Sailor 900 is the subject of Speedcast's recently granted special temporary authorization ("STA") to communicate with the Intelsat-19 satellite. See Speedcast Communications Inc., File No. SES-STA-20190815-01100. The Sailor 900 operations proposed herein are identical to those authorized in the STA.

⁶ See ITC Global, File No. SES-MFS-20180829-02321, Call Sign E070239 (authorizing the Sailor 900, SeaTel 6009 and Spacetrack 4024 for Ku-band operations) and Speedcast Communications Inc., File No. SES-MOD-20151210-00928, Call Sign E090176 ("*Speedcast ESV License*") (authorizing the V240M for Ku-band operations). The V240MT will operate using a lower input power than the previously authorized V240M version.

applicable, and at all times in compliance with the relevant EIRP spectral density masks in Section 25.218(f) Commission's rules. During Ka-band operations, Speedcast will operate the V240MT at a slightly lower maximum EIRP level due to differences in the Ka-band input power and antenna gain, but will remain within the limits specified in Section 25.138(a) of the Commission's rules. Therefore, this modification application is eligible for routine processing under the Commission's rules.⁷ Speedcast provides the FCC Form 312 Schedule B for information relating to the proposed earth station operations and a radiation hazard analysis for each remote.

The addition of the New VSAT Remotes to the *VSAT Blanket License* will serve the public interest by allowing Speedcast to provide more efficient and flexible services in the United States and enable more diverse customer equipment options. In addition, operation of the New VSAT Remotes 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. Finally, the ability of Speedcast to operate in Alaska, Hawaii and U.S. Territories will allow it to further expand its network and cover more regions, creating an additional competitive alternative for customers throughout the United States.

Finally, together with this Application, Speedcast resubmits its Section 1.65 letter dated May 21, 2019, clarifying and updating the remote-control points for eighteen of its licenses, including this *VSAT Blanket License*. As it relates to this license, the Letter was originally associated in IBFS with the previous modification application, File No. SES-MOD 20190225-00191, which is now being withdrawn. To ensure the letter's continued effect, Speedcast now seeks to associate it with this Application.

⁷ Although this application is eligible for routine processing, in the interest of completeness, Speedcast provides Ku-band and Ka-band EIRP spectral density plots for the V240MT demonstrating compliance with the relevant EIRP spectral density masks in the FCC rules.

II. CONCLUSION

Based on the foregoing, Speedcast respectfully requests that the Commission modify the *Blanket VSAT License*, Call Sign E910609, by adding authority to operate the New VSAT Remotes in conventional Ku-band and Ka-band frequencies in CONUS, Alaska, Hawaii and U.S. Territories, as well as expand the area of operations for all previously licensed remotes.