



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
RADIO STATION AUTHORIZATION

Name: Comsat, Inc.

Call Sign: KA31

Authorization Type: Renewal of License

File Number: SES-RWL-20210520-00825

Common Carrier

Grant date: 05/24/2021

Expiration Date: 07/08/2036

Nature of Service: Fixed Satellite Service

Nature of Service: Mobile Satellite Service

Class of Station: Fixed Earth Stations

A) Site Location(s)

#	Site ID	Address	Latitude	Longitude	Elevation (Meters)	NAD	Special Provisions (Refer to Section H)
1)	1	7676 PINE GROVE RD SANTA PAULA, VENTURA, CA 93060	34°24'6.7"N	119°4'25.4"W	232	83	

Licensee certifies antenna(s) comply with gain patterns specified in Section 25.209

Subject to the provisions of the Communications Act of 1934, The Communications Satellite Act of 1962, subsequent acts and treaties, and all present and future regulations made by this Commission, and further subject to the conditions and requirements set forth in this license, the grantees are authorized to construct, use and operate the radio facilities described below for radio communications for the term beginning July 8, 2021 (3 AM Eastern Standard Time) and ending July 8, 2036 (3 AM Eastern Standard Time) . The required date of completion of construction and commencement of operation is 00/00/0000. Grantee must file with the Commission a certification upon completion of construction and commencement of operation.

B) Particulars of Operations

The General Provision 1010 applies to all receiving frequency bands.

The General Provision 1900 applies to all transmitting frequency bands.

For the text of these provisions, refer to Section H.

#	Frequency (MHz)	Polarization Code	Emission	Tx/Rx Mode	Max EIRP /Carrier (dBW)	Max EIRP Density /Carrier (dBW/4kHz)	Associated Antenna	Special Provisions (Refer to Section H)	Modulation/ Services
1)	6454.4000-6456.6000	R	NON	Tx	77.00	77.00	12.8M	Pilot	
2)	6454.4000-6456.6000	R	10K5G2E	Tx	70.00	65.80	12.8M	AERO	
3)	6454.4000-6456.6000	R	1K20G2D	Tx	70.00	70.00	12.8M	AERO	
4)	6454.4000-6456.6000	R	2K40G2D	Tx	70.00	70.00	12.8M	AERO	
5)	6454.4000-6456.6000	R	600HG2D	Tx	70.00	70.00	12.8M	AERO	
6)	6454.4000-6456.6000	R	1K20G1D	Tx	77.00	77.00	12.8M	STD-C	
7)	6454.4000-6456.6000	R	600HG1D	Tx	77.00	77.00	12.8M	STD-C	
8)	6454.4000-6456.6000	R	NON	Tx	77.00	77.00	12.8M	Test signal	
9)	6454.4000-6456.6000	R	1K20G1D	Tx	77.00	77.00	12.8M	STD- A telex	



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10)	6454.4000-6456.6000	R	24K0F3E	Tx	77.00	74.70	12.8M		Analog Voice
11)	6443.0000-6454.0000	R	NON	Tx	77.00	77.00	12.8M		pilot
12)	6443.0000-6454.0000	R	10K5G2E	Tx	70.00	65.80	12.8M		AERO
13)	6443.0000-6454.0000	R	1K20G2D	Tx	70.00	70.00	12.8M		AERO
14)	6443.0000-6454.0000	R	2K40G2D	Tx	70.00	70.00	12.8M		AERO
15)	6443.0000-6454.0000	R	600HG2D	Tx	70.00	70.00	12.8M		AERO
16)	6443.0000-6454.0000	R	1K20G1D	Tx	77.00	77.00	12.8M		STD-C
17)	6443.0000-6454.0000	R	600HG1D	Tx	77.00	77.00	12.8M		STD-C
18)	6443.0000-6454.0000	R	NON	Tx	77.00	77.00	12.8M		Test signal
19)	6443.0000-6454.0000	R	1K20G1D	Tx	77.00	77.00	12.8M		STD-A telex
20)	6443.0000-6454.0000	R	24K0F3E	Tx	77.00	74.70	12.8M		Analog Voice
21)	6417.5000-6443.0000	R	NON	Tx	77.00	77.00	12.8M		PILOT SIGNAL
22)	6417.5000-6443.0000	R	NON	Tx	77.00	77.00	12.8M		TEST SIGNALS
23)	6417.5000-6443.0000	R	1K20G1D	Tx	77.00	77.00	12.8M		TDM TELEX
24)	6417.5000-6443.0000	R	24K0F3E	Tx	77.00	74.70	12.8M		SCPC FM, VOICE
25)	6417.5000-6443.0000	R	1K20G1D	Tx	77.00	77.00	12.8M		STD-C DIGITAL SIGNALS
26)	6417.5000-6443.0000	R	600HG1D	Tx	77.00	77.00	12.8M		STD-C DIGITAL SIGNALS
27)	6417.5000-6443.0000	R	10K5G2E	Tx	70.00	65.80	12.8M		AERONAUTICAL DIGITAL TRANSMIT CHANNELS
28)	6417.5000-6443.0000	R	1K20G2D	Tx	70.00	70.00	12.8M		AERONAUTICAL DIGITAL TRANSMIT CHANNELS
29)	6417.5000-6443.0000	R	2K40G2D	Tx	70.00	70.00	12.8M		AERONAUTICAL DIGITAL TRANSMIT CHANNELS
30)	6417.5000-6443.0000	R	600HG2D	Tx	70.00	70.00	12.8M		AERONAUTICAL DIGITAL TRANSMIT CHANNELS
31)	4192.5000-4200.0000	L	NON	Rx			12.8M		



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32)	4192.5000-4200.0000	L	10K5G2E	Rx			12.8M		
33)	4192.5000-4200.0000	L	1K20G1D	Rx			12.8M		
34)	4192.5000-4200.0000	L	1K20G1D	Rx			12.8M		
35)	4192.5000-4200.0000	L	1K20G2D	Rx			12.8M		
36)	4192.5000-4200.0000	L	2K40G2D	Rx			12.8M		
37)	4192.5000-4200.0000	L	600HG1D	Rx			12.8M		
38)	4192.5000-4200.0000	L	600HG2D	Rx			12.8M		
39)	4192.5000-4200.0000	L	NON	Rx	0.00		12.8M		
40)	4192.5000-4200.0000	L	24K0F3E	Rx	0.00		12.8M		
41)	3600.0000-3629.0000	L	NON	Rx			12.8M		
42)	3600.0000-3629.0000	L	NON	Rx			12.8M		
43)	3600.0000-3629.0000	L	10K5G2E	Rx			12.8M		
44)	3600.0000-3629.0000	L	1K20G1D	Rx			12.8M		
45)	3600.0000-3629.0000	L	1K20G1D	Rx			12.8M		
46)	3600.0000-3629.0000	L	1K20G2D	Rx			12.8M		
47)	3600.0000-3629.0000	L	24K0F3E	Rx			12.8M		
48)	3600.0000-3629.0000	L	2K40G2D	Rx			12.8M		
49)	3600.0000-3629.0000	L	600HG1D	Rx			12.8M		
50)	3600.0000-3629.0000	L	600HG2D	Rx			12.8M		
51)	1626.5000-1660.5000	R	NON	Tx	37.00	37.00	12.8M	Pilot	
52)	1626.5000-1660.5000	R	10K5G2E	Tx	27.00	22.80	12.8M	AERO	
53)	1626.5000-1660.5000	R	1K20G2D	Tx	18.00	18.00	12.8M	AERO	
54)	1626.5000-1660.5000	R	2K40G2D	Tx	21.00	21.00	12.8M	AERO	
55)	1626.5000-1660.5000	R	600HG2D	Tx	15.00	15.00	12.8M	AERO	



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56)	1626.5000-1660.5000	R	1K20G1D	Tx	16.00	16.00	12.8M		STD-C
57)	1626.5000-1660.5000	R	600HG1D	Tx	16.00	16.00	12.8M		STD-C
58)	1626.5000-1660.5000	R	NON	Tx	37.00	37.00	12.8M		Test signal
59)	1626.5000-1660.5000	R	1K20G1D	Tx	16.00	16.00	12.8M		STD-A Telex
60)	1626.5000-1660.5000	R	24K0F3E	Tx	37.00	34.70	12.8M		Analog voice
61)	1574.4000-1576.6000	L	NON	Rx			12.8M		
62)	1574.4000-1576.6000	L	NON	Rx			12.8M		
63)	1574.4000-1576.6000	L	10K5G2E	Rx			12.8M		
64)	1574.4000-1576.6000	L	1K20G1D	Rx			12.8M		
65)	1574.4000-1576.6000	L	1K20G1D	Rx			12.8M		
66)	1574.4000-1576.6000	L	1K20G2D	Rx			12.8M		
67)	1574.4000-1576.6000	L	24K0F3E	Rx			12.8M		
68)	1574.4000-1576.6000	L	2K40G2D	Rx			12.8M		
69)	1574.4000-1576.6000	L	600HG1D	Rx			12.8M		
70)	1574.4000-1576.6000	L	600HG2D	Rx			12.8M		
71)	1525.0000-1559.0000	L	NON	Rx			12.8M		
72)	1525.0000-1559.0000	L	NON	Rx			12.8M		
73)	1525.0000-1559.0000	L	10K5G2E	Rx			12.8M		
74)	1525.0000-1559.0000	L	1K20G1D	Rx			12.8M		
75)	1525.0000-1559.0000	L	1K20G1D	Rx			12.8M		
76)	1525.0000-1559.0000	L	1K20G2D	Rx			12.8M		
77)	1525.0000-1559.0000	L	24K0F3E	Rx			12.8M		
78)	1525.0000-1559.0000	L	2K40G2D	Rx			12.8M		
79)	1525.0000-1559.0000	L	600HG1D	Rx			12.8M		



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#	Frequency (MHz)	Polarization Code	Emission	Tx/Rx Mode	Max EIRP /Carrier (dBW)	Max EIRP Density /Carrier (dBW/4kHz)	Associated Antenna	Special Provisions (Refer to Section H)	Modulation/ Services
80)	1525.0000-1559.0000	L	600HG2D	Rx		12.8M			

C) Frequency Coordination Limits

#	Frequency Limits (MHz)	Satellite Arc (Deg. Long.)		Elevation (Degrees)		Azimuth (Degrees)		Max EIRP Density toward Horizon (dBW/4kHz)	Associated Antenna(s)
		East Limit	West Limit	East Limit	West Limit	East Limit	West Limit		
1)	6417.5000-6454.0000	48.0W-190.0W		06.9-07.0		101.0-258.9		43.4	12.8M
2)	3600.0000-3629.0000	48.0W-190.0W		06.9-07.0		101.0-258.9		0	12.8M
3)	4192.5000-4200.0000	48.0W-190.0W		06.9-07.0		101.0-258.9		0	12.8M
4)	1626.5000-1660.5000	48.0W-190.0W		06.9-07.0		101.0-258.9		43.4	12.8M
5)	1525.5000-1559.0000	48.0W-190.0W		06.9-07.0		101.0-258.9		0	12.8M
6)	1574.4000-1576.6000	48.0W-190.0W		06.9-07.0		101.0-258.9		0	12.8M
7)	6454.4000-6456.6000	48.0W-190.0W		06.9-07.0		101.0-258.9		53.3	12.8M
8)	5925.0000-6425.0000	48.0W-190.0W		06.9-07.0		101.0-258.9		53.3	12.8M
9)	3700.0000-4200.0000	48.0W-190.0W		06.9-07.0		101.0-258.9			12.8M

D) Points of Communications

The following stations located in the Satellite orbits consistent with Sections B and C of this Entry:

- 1) 1 to INMARSAT satellite(s) in POR of the INMARSAT system (Non-U.S.-licensed)
- 2) 1 to All Inmarsat satellites on "ISAT List" authorized to access U.S. in the L-Band
- 3) 1 to INMARSAT 4F3 satellite(S2932) @ 98 degrees W.L. (United Kingdom-licensed)
- 4) 1 to Permitted Space Station List
- 5) 1 to INMARSAT 3F3 satellite @178.0 degrees E.L. (United Kingdom-licensed)



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E) Antenna Facilities

Site ID	Antenna ID	Units	Diameter (meters)	Manufacturer	Model number	Site Elevation (Meters)	Max Antenna Height (Meters)	Special Provisions (Refer to Section H)
1	12.8M	1	12.8	PHILCO-FORD	42-FOOT	232	15.2 AGL/ 232 AMSL	
<p>Max Gains(s) : 52.8 dBi @ 4.0000 GHz 56.0 dBi @ 6.0000 GHz 40.0 dBi @ 1.6400 GHz 39.0 dBi @ 1.5400 GHz</p>								
<p>Maximum total input power at antenna flange (Watts) = 2,000.00</p>								
<p>Maximum aggregate output EIRP for all carriers (dBW) = 89.00</p>								

F) Remote Control Point:

1

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G) Antenna Structure marking and lighting requirements:

None unless otherwise specified under Special and General Provisions

H) Special and General Provisions

A) This RADIO STATION AUTHORIZATION is granted subject to the following special provisions and general conditions:

4 --- Licensee must ensure that a current listing of the name, title, mailing address, email address, and telephone number of the responsible point of contact are on file at the FCC. Any changes must be filed electronically in the International Bureau Filing System (MyIBFS) using the "Pleadings and Comments" link on the MyIBFS homepage within 10 days of the change.

5 --- Licensee must notify the Commission when this earth station is no longer operational or when it has not been used to provide any service during any 6-month operation.

6 --- Licensee must comply with the license modification and notification requirements of 47 CFR § 25.118 to change the coordinates of its authorized earth station.

9 --- Site location coordinates are based on the WGS84 datum.



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H) Special and General Provisions

A) This RADIO STATION AUTHORIZATION is granted subject to the following special provisions and general conditions:

297 --- Operations in the 1525-1559 MHz and 1626.5-1660.5 MHz frequency bands shall have the following minimum set of capabilities to ensure compliance with Footnotes 5.357A, 5.353A, US308, and US315 to Section 2.106 of the Commission's rules, 47 C.F.R. 2.106:

- (1) All Land Earth Station (LES) transmissions to mobile earth stations (MESs) shall have a priority assigned to them that preserves the priority and preemptive access given to maritime distress and safety communications.
- (2) The LES shall recognize the priority of calls to and from MES and make channel assignments taking into account the priority access that is given to maritime distress and safety communications.
- (3) The LES shall be capable of receiving the MES identification number when transmitted and verifying that it is an authorized user of the system to prohibit unauthorized access.
- (4) The LES shall be capable of transmitting channel assignment commands to the MESs.
- (5) The communications channels used between the LES and the MES shall have provision for signalling within the voice/data channel, for an MES, which does not continuously monitor the LES signalling channel during the time of a call.
- (6) The LES shall transmit periodic control signalling signals to MES, which do not continuously monitor the LES signalling channel.
- (7) The LES shall automatically inhibit all transmissions to MESs to which it is not transmitting a signalling channel or signalling within the communications channel.
- (8) The LES shall be capable of transmitting channel-shut-off commands to the MESs on signalling or communications channels.
- (9) Each LES shall be capable of interrupting, and if necessary, preempting ongoing routine traffic from an MES in order to complete a maritime distress, urgency or safety call to that particular MES.
- (10) Each LES shall be capable of automatically turning off one or more of its associated channels in order to complete a maritime distress, urgency or safety call.

2627 --- All services are interconnected to the Public Switched Network.

5813 --- This authorization is issued pursuant to and subject to the terms and conditions in the Commission's Order released March 19, 1991, DA 91-303.

5814 --- This authorization is issued pursuant to and subject to the terms and conditions in the Commission's Order released July 8, 1996, DA 96-1079, and Erratum released July 9, 1996.

5815 --- Operations on the 6425-6454 and 6454.4-6456.6 MHz frequency bands shall not cause harmful radio interference to any other lawfully operated terrestrial radio station, and operations shall cease immediately upon notification of such interference. Complaints of all radio interference shall be forwarded immediately to the Commission, in writing. (Note: frequency coordination in accordance with the Section 25.203 of the Commission's Rules is required for operation in the bands shared with the terrestrial facilities.)

5830 --- This authorization is subject to the conditions and terms set forth in the Commission's Memorandum Opinion, Order and Authorization, FCC 01-272, released October 9, 2001 (INMARSAT Ltd. Order).

5847 --- Mobile earth station operations shall be limited to the portions of the 1525-1559 and 1626.5-1660.5 MHZ band coordinated for the satellite being accessed in the most recent annual L-band operator-to-operator agreement.



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A) This RADIO STATION AUTHORIZATION is granted subject to the following special provisions and general conditions:

5848 --- In the absence of a continuing annual L-band operator-to-operator coordination agreement, Licensee's operation in the 1525-1530 MHz, 1530-1544 MHz, 1626.5-1645.5 MHz frequency bands (lower L-bands) and the 1545-1559 MHz and 1646.5-1660.5 MHz (upper L-band) frequency bands will be on a non-interference basis until a future operator-to-operator agreement is concluded. Licensee shall not cause harmful interference to any other lawfully operating satellite or radio facility and shall cease operations upon notification of such interference. Furthermore, Licensee must notify all other operators in these frequency bands that it will be operating on a non-interference basis. Licensee must notify its customers in the United States that its operations are on a non-harmful interference basis.

5849 --- The full-duplex mobile earth station terminals (METs) operating in the 1525-1530 MHz, 1530-1544 MHz and 1626.5-1645.5 MHz bands shall have the following minimum set of capabilities to ensure compliance with Footnote S5.353A and the priority and real-time preemption requirements imposed by Footnote 315: (1) All METs transmission shall have a priority assigned to them that preserves the priority and preemptive access given to maritime distress and safety communications sharing the band; (2) Each MET with a requirement to handle maritime distress and safety data communications shall be capable of either (a) recognizing message and call priority identification when transmitted from its associated Land Earth Station (LES) or (b) accepting message and call priority identification embedded in the message or call when transmitted from its associated LES and passing the identification to shipboard data message processing equipment; (3) Each MET shall be assigned access to a unique technical identification number that will be transmitted upon any attempt to gain access to a system; (4) After a MET has gained access to a system the mobile terminal shall be under the control of a LES and shall obtain all channel assignments from it; (5) All METs that do not continuously monitor a separate signaling channel or signaling within the communications channel shall monitor the signaling channel at the end of each transmission; (6) Each MET shall automatically inhibit its transmissions if it is not correctly receiving a separate signaling channel or signaling within the communications channel from its associated LES; (7) Each MET shall automatically inhibit its transmission on any or all channels upon receiving a channel-shut-off command on a signaling or communications channel it is receiving from its associated LES; (8) Each MET with a requirement to handle maritime distress and safety communications shall have the capability within the station to automatically preempt lower precedence traffic.

5852 --- The authorized mobile earth terminals (METs) shall comply with the out-of-band emission limits set forth in Sections 25.202(f) and 25.216 of the Commission's rules. See 47 C.F.R. §§ 25.202(f) and 25.216; Out-of-Band Emission Orders, FCC 02-34 (rel. May 14, 2002), as amended by FCC-03-0283 (rel. November 18, 2003).

5861 --- Licensee must maintain a current listing of platform users on which terminals are located, including the user/customer phone number and necessary information to terminate Licensee's operation if harmful interference is caused to the GMDSS.

5864 --- Licensee's system must not inhibit future changes or expansions of GMDSS communications capabilities, including the use of different modulation and multiple access schemes or the relocation or the use of other Inmarsat satellites for GMDSS.

5956 --- The authorized mobile earth terminals (METs) shall comply with the out-of-band emission limits set forth in Sections 25.202(f) and 25.216 of the Commission's rules. See 47 C.F.R. §§ 25.202(f) and 25.216; Out-of-Band Emission Orders, FCC 02-34 (rel. May 14, 2002), as amended by FCC-03-0283 (rel. November 18, 2003).

6554 --- In accordance with Footnote US315, operation in the Lower L-band 1525-1530 MHz, 1530-1544 and 1626.5-1646.5 MHz, is on a secondary basis to safety and distress communications of those stations operating in the Global Maritime Distress Satellite Service.



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H) Special and General Provisions

A) This RADIO STATION AUTHORIZATION is granted subject to the following special provisions and general conditions:

90398 --- Changes to previously authorized transmitting facilities, operations and devices regulated by the Commission that may have significant environmental impact, and are not excluded by §1.1306, require the preparation of an Environmental Assessment (EA) by the licensee. (See 47 C.F.R. §§1.1307, 1.1308 and 1.1311)

90399 --- The licensee shall, at all times, take all necessary measures to ensure that operation of this (these) authorized earth station(s) does not create potential exposure of humans to radiofrequency radiation in excess of the FCC exposure limits defined in 47 CFR §§ 1.1307(b) and 1.1310. Physical measures must be taken to ensure compliance with limits for both occupational/controlled exposure and for general population/uncontrolled exposure, as defined in these rule sections. Compliance can be accomplished in most cases by appropriate restrictions, such as fencing. Requirements for restrictions can be determined by predictions based on calculations, modeling, or by field measurements. The FCC's OET Bulletin 65 (available on-line at www.fcc.gov/oet/rfsafety) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alerting signs and protective equipment for workers.

90405 --- Operations with PERMITTED LIST satellite must comply with §25.212 levels and operations above these levels must coordinate with satellite operators prior to operations.

900407 --- The Permitted Space Station List (Permitted List) is a list of all geostationary space stations providing fixed-satellite service pursuant to a Commission license or grant of U.S. market access. The Permitted List currently includes the following frequency bands per §25.103 and §25.115(k)(1):

3600-4200 MHz (space-to-Earth)
5850-6725 MHz (Earth-to-space)
10.95-11.2 GHz (space-to-Earth)
11.45-12.2 GHz (space-to-Earth)
13.75-14.5 GHz (Earth-to-space)
18.3-18.8 GHz (space-to-Earth)
19.7-20.2 GHz (space-to-Earth)
24.75-25.25 GHz (Earth-to-space)
28.35-28.6 GHz (Earth-to-space)
29.25-30.0 GHz (Earth-to-space).

Earth stations with "Permitted List" designated as a point of communication may access any space station on the Permitted List, provided the operations comply with the applicable "routine" uplink and downlink limits, are within the specific frequency bands authorized in the earth station license, have completed coordination with terrestrial stations pursuant to §25.203, and otherwise comply with all terms and conditions of both the earth station license and the space station grant.



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
RADIO STATION AUTHORIZATION

Name: Comsat, Inc.

Call Sign: KA31

Authorization Type: Renewal of License

File Number: SES-RWL-20210520-00825

Common Carrier

Grant date: 05/24/2021

Expiration Date: 07/08/2036

B) This RADIO STATION AUTHORIZATION is granted subject to the additional conditions specified below:

This authorization is issued on the grantee's representation that the statements contained in the application are true and that the undertakings described will be carried out in good faith.

This authorization shall not be construed in any manner as a finding by the Commission on the question of marking or lighting of the antenna system should future conditions require. The grantee expressly agrees to install such marking or lighting as the Commission may require under the provisions of Section 303(q) of the Communications Act. 47 U.S.C. § 303(q).

Neither this authorization nor the right granted by this authorization shall be assigned or otherwise transferred to any person, firm, company or corporation without the written consent of the Commission. This authorization is subject to the right of use or control by the government of the United States conferred by Section 706 of the Communications Act. 47 U.S.C. § 706. Operation of this station is governed by Part 25 of the Commission's Rules. 47 C.F.R. Part 25.

This authorization shall not vest in the licensee any right to operate this station nor any right in the use of the designated frequencies beyond the term of this license, nor in any other manner than authorized herein.

This authorization is issued on the grantee's representation that the station is in compliance with environmental requirements set forth in Section 1.1307 of the Commission's Rules. 47 C.F.R. § 1.1307.

This authorization is issued on the grantee's representation that the station is in compliance with the Federal Aviation Administration (FAA) requirements as set forth in Section 17.4 of the Commission's Rules. 47 C.F.R. § 17.4.

The following condition applies when this authorization permits construction of or modifies the construction permit of a radio station.

This authorization shall be automatically forfeited if the station is not ready for operation by the required date of completion of construction unless an application for modification of authorization to request additional time to complete construction is filed by that date, together with a showing that failure to complete construction by the required date was due to factors not under control of the grantee.

Licensees are required to pay annual regulatory fees related to this authorization. The requirement to collect annual regulatory fees from regulatees is contained in Public Law 103-66, "The Omnibus Budget Reconciliation Act of 1993." These regulatory fees, which are likely to change each fiscal year, are used to offset costs associated with the Commission's enforcement, public service, international and policy and rulemaking activities. The Commission issues a Report and Order each year, setting the new regulatory fee rates. Receive only earth stations are exempt from payment of regulatory fees.