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October 24, 2012

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: **Application of Panasonic Avionics Corporation for Special Temporary Authority, File No. SES-STA-20120913-00820 (Call Sign E100089)**

Dear Ms. Dortch:

Panasonic Avionics Corporation (“Panasonic”), pursuant to Section 1.65 of the Commission’s Rules, 47 C.F.R. § 1.65, hereby submits this letter to clarify certain information contained in the above-referenced request for special temporary authority (“STA”) filed with the Commission on September 13, 2012. In addition, Panasonic seeks to associate certain additional information contained in its concurrently filed license modification application with the above-referenced STA request.<sup>1</sup>

First, as the Commission is aware, Panasonic filed the STA request to support engineering flights and the initial introduction of eXConnect in-flight broadband connectivity for its U.S. launch customer, United Airlines (“United”). The initial installation of United’s first eXConnect-equipped aircraft was completed earlier this month, and the aircraft has undergone a number of check-out flights to ensure the system is functioning properly. The aircraft is currently out of service for repainting and will return to service by mid-next week. Accordingly, Panasonic respectfully requests grant of the STA, as clarified herein, by October 31, 2012.

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<sup>1</sup> Application of Panasonic Avionics Corporation To Modify AMSS License To Permit Operation of Up to 2000 Technically Identical Aeronautical Mobile-Satellite Service (“AMSS”) Aircraft Earth Stations (“AESs”) in the 14.0-14.5 GHz and 10.7-12.75 GHz Frequency Bands, File No. SES-MFS-20120913-00818 (Call Sign E100089) (“Modification Application”).

Second, during the initial introduction of eXConnect in-flight connectivity, United seeks to utilize eXConnect-equipped aircraft (including the current launch aircraft and a handful of follow-on aircraft available during the first few months of operation) on a number of domestic and international routes. For example, United seeks to test passenger uptake and system utilization on U.S. coast-to-coast flights, as well as flights to Canada, Mexico and the Caribbean. Flexibility with respect to routes will allow United to better assess passenger demand and optimize the eXConnect-equipped aircraft as they become available.

In this connection, the narrative statement accompanying the STA request refers to planned “domestic operations” with the Galaxy 17 satellite.<sup>2</sup> However, the Galaxy 17 satellite beam also covers foreign and international airspace in other portions of North America.<sup>3</sup> Thus, Panasonic now requests authority for operation in the entirety of its coverage footprint, including regions outside the United States. Interim operation in the Galaxy 17 coverage footprint will not increase the potential for interference because: (i) the potential for adjacent satellite interference is independent of aircraft location; (ii) the terminals operate in accordance with international requirements; (iii) the Aura LE terminal is already operating with the Galaxy 17 satellite on a large number of foreign-registered aircraft; and (iv) the Aura LE terminal utilizes TDMA technology so only one terminal may transmit on any given frequency at any particular time slot.<sup>4</sup>

Consistent with the desire for operational flexibility, Panasonic also seeks to communicate with three additional satellites identified in the underlying Modification Application that would provide the necessary near-term coverage on routes of interest to United. These satellites are GE-23 at 172° E.L., Telstar 11N at 37.5° W.L., and Telstar 14R at 63° W.L.<sup>5</sup> Together with Galaxy 17, these satellites offer coverage of the Americas and adjacent ocean regions to serve United routes during the pendency of the underlying Modification Application.

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<sup>2</sup> See Application of Panasonic Avionics Corporation for Special Temporary Authority, File No. SES-STA-20120913-00820 (Call Sign E100089), Narrative Statement at 2-3, 13-14 (filed Sep. 13, 2012) (“STA Narrative”).

<sup>3</sup> See Intelsat Fact Sheet: Serving Intelsat Customers Throughout North America & the Caribbean, Intelsat Corporation (last accessed Oct. 18, 2012) (available at <http://www.intelsat.com/files/resources/satellites/G-17-factsheet.pdf>).

<sup>4</sup> STA Narrative at 13-14.

<sup>5</sup> See Modification Application at Att. 1 (Technical Appendix). The Telstar 14R satellite is also identified in Commission documents as Estrela do Sul.

Importantly, the STA request was filed contemporaneously with the underlying Modification Application, but is narrower in scope than that application. In addition, the operational and technical specifications requested for the STA are fully consistent with those proposed in the Modification Application. Thus, linking Panasonic's STA request, as clarified herein, to the underlying Modification Application remains appropriate.

Finally, to ensure that that the STA docket includes the technical information associated with the additional satellite points of communications, Panasonic incorporates by reference the coverage and other information regarding the three additional satellites set forth in the Modification Application.<sup>6</sup> Of course, as noted previously, these satellites are currently being used to support eXConnect operations onboard a large number of foreign aircraft so permitting a limited number of United aircraft to access the satellites would not increase the potential for interference from eXConnect operations and would otherwise serve the public interest.

Please feel free to contact the undersigned with any questions you may have or if Panasonic can provide any additional information to facilitate expeditious action on its STA request.

Respectfully submitted,

Squire Sanders (US) LLP

*/s/ Carlos M. Nalda*

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Carlos M. Nalda

*Counsel to Panasonic Avionics Corporation*

cc: Paul Blais, FCC International Bureau  
Stephen Duall, FCC International Bureau

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<sup>6</sup> See *id.* at 23-24, 27; Modification Application (Narrative Statement) at 16; Modification Application at Att. 3 (Coordination Information) at 1-5; see also Section 1.65 Notification Letter, SES-MFS-20120913-00818 (filed Oct. 1, 2012).