

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Gogo LLC (“Gogo”) hereby requests special temporary authority (“STA”) for a period of 30 days beginning no later than December 19, 2012, to operate a single Aeronautical Mobile Satellite Service (“AMSS”) transmit/receive terminal on a commercial aircraft. The AMSS terminal will communicate with the SES-1 and NSS-703 satellites in the conventional Ku-band (14-14.5 GHz uplink and 11.7-12.2 GHz downlink).¹ Grant of the requested STA is consistent with Commission precedent and will serve the public interest by enabling Gogo to perform tests necessary to comply with Federal Aviation Administration (“FAA”) equipment certification requirements.

Gogo has an application pending before the Commission for a blanket license for AMSS operations.² That application includes complete technical information regarding the Gogo AMSS system and fully describes the AeroSat terminals that will be used in this testing. Gogo incorporates that information by reference herein.

Gogo has also been granted Commission STA to perform ground-based testing of the AMSS terminals in the conventional Ku-band using the SES-1 and NSS-703 spacecraft.³ Gogo now seeks to use the same satellites for additional ground and in-flight testing necessary in connection with FAA certification.

Specifically, a single terminal will be installed on a Delta Airlines 767-300 aircraft. Testing will initially occur on the ground at the Detroit, MI airport (DTW), followed by in-flight testing in an area within 500 miles of DTW. The ground testing is expected to take a day and is currently scheduled to occur on December 20. The in-flight testing will take place over two days and is currently scheduled for December 21-22. In order to accommodate this schedule for the planned certification evaluation, Gogo respectfully requests action on this STA request by

¹ SES-1 is the primary spacecraft for the test, but Gogo seeks authority to use spot beam 2 of NSS-703 as back-up capacity if needed.

² *Gogo LLC*, Call Sign E120106, File Nos. SES-LIC-20120619-00574; SES-AMD-20120731-00709 & SES-AFS-20121008-00902 (the “Gogo AMSS Application”). The public notice period for the Gogo AMSS Application has closed, and no party has opposed grant of the application. The only comments filed involve Gogo’s proposed operations outside the conventional Ku-band. *See* Comments of EchoStar Satellite Operating Corporation, File Nos. SES-LIC-20120619-00574 *et al.*, dated Nov. 16, 2012; Comments of EchoStar Satellite Operating Corporation and DIRECTV Enterprises, LLC, File Nos. SES-LIC-20120619-00574 *et al.*, dated Nov. 16, 2012. Because the authority sought here is limited to conventional Ku-band operations, the questions raised in the comments are not relevant to the requested STA.

³ *Gogo LLC*, Call Sign E120106, File No. SES-STA-20120727-00698, granted Aug. 29, 2012 (testing authority for communications with SES-1); File No. SES-STA-20121009-00908, granted Oct. 24, 2012 (extension for SES-1 and expansion of STA to include spot beam 2 on NSS-703).

December 19. Although the testing should be completed in a few days, Gogo is seeking STA for 30 days in order to account for the possibility of delays in initiation or completion of the testing.

Grant of the requested authority will not adversely affect other licensed operations. Gogo has submitted affidavits confirming that the proposed AMSS operations using the AeroSat terminals have been coordinated with operators of the satellites within six degrees on either side of both SES-1 and NSS-703.⁴ Gogo has also entered into a coordination agreement with the National Science Foundation to protect radioastronomy operations.⁵ In any event, Gogo seeks to operate on an unprotected, non-harmful interference basis, so operations pursuant to the requested STA will not harm other regularly licensed Ku-band spectrum users.

Grant of the requested authority is consistent with prior Commission actions⁶ and will serve the public interest by permitting Gogo to continue developing a competitive AMSS network that will enhance service to air travelers and airline crew members.

⁴ *Gogo LLC*, Call Sign E120106, File No. SES-AMD-20120731-00709, Amendment Exhibit A.

⁵ *Id.*, Amendment Exhibit B.

⁶ The International Bureau has previously granted special temporary authority for other entities to perform testing of AMSS terminals pending regular licensing of AMSS operations. *See, e.g., Row 44, Inc.*, File No. SES-STA-20071121-01610, grant-stamped Dec. 11, 2007 (30-day STA for testing of AMSS terminal).