

EXPLANATORY STATEMENT

Row 44, Inc. (“Row 44”) seeks special temporary authority (“STA”) for a 60-day period to operate its licensed Ku-band aeronautical mobile-satellite service system, which will be regulated under the FCC’s new Earth Stations Aboard Aircraft (“ESAA”) regulations, using conventional Ku-band capacity (11.7-12.2 GHz and 14.0-14.5 GHz) on Intelsat 27 (“IS-27”) at 55.5° W.L. (FCC Call Sign S2827). The STA seeks a portion of the authority that has been requested in an application for license modification, an application which also seeks access to Intelsat-19 at 166° E.L. (File No SES-MOD-20121023-00963). In its modification application, Row 44 requested that the FCC place the application on public notice expeditiously to allow processing consistent with the projected implementation schedule for IS-27, which it stated was anticipated to be launched in the first quarter of 2013.

The Row 44 Modification Application has not yet appeared on Public Notice. Preparations for the launch and entry into service of IS-27, however, continue to advance on schedule. Launch is currently scheduled for the early morning hours of January 31, 2013 aboard a Sea Launch Zenit-3SL rocket from a location on the equator at 154° W.L., off the coast of Kiribati. After arrival on station and a period of in-orbit testing, IS-27 is currently expected to enter into service during March 2013.

All technical and other required information concerning Row 44’s planned use of IS-27 is contained in the underlying application, including a coordination certification letter signed by Intelsat with respect to this satellite. The pending modification application seeks access to extended Ku-band frequencies, including the 12.25-12.75 GHz downlink band, which is not covered by the new ESAA rules, but Row 44 seeks access via this STA only to the conventional Ku-band frequencies at 11.7 to 12.2 GHz (downlink) and 14.0 to 14.5 GHz (uplink).

Grant of the requested authority will serve the public interest by permitting Row 44 to continue to expand its AMSS/ESAA network for the benefit of both air travelers and airline crew members. In particular, addition of IS-27 to Row 44’s existing authority will provide new coverage in the Atlantic Ocean region, which will allow it to provide service to European air carriers on trans-oceanic routes. As noted above, the conventional Ku-band capacity for which Row 44 has contracted on IS-27 will become available as early as March. Accordingly, Row 44 respectfully requests that the FCC grant it authority commencing on or before March 1, 2013 to use the IS-27 satellite as a point of communication under its existing FCC license for transmissions in the conventional Ku-band.