

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

In the Matter of

Application of Panasonic Avionics Corporation for Special Temporary Authority to Permit Operation of Up to 100 Technically Identical Aeronautical Mobile-Satellite Service (“AMSS”) Aircraft Earth Stations (“AESs”) in the 14.0-14.5 GHz and 11.7-12.2 GHz Frequency Bands)))	Call Sign E100089
)))	File No. _____

**APPLICATION FOR RENEWAL AND EXPANSION
OF SPECIAL TEMPORARY AUTHORIZATION**

Panasonic Avionics Corporation (“Panasonic”), pursuant to Section 25.120(b)(3) of the Commission’s Rules, 47 C.F.R. § 25.120(b)(3), seeks renewal and a limited expansion of the 60-day special temporary authority (“STA”) to permit continued commercial operation of the Aura LE aircraft earth station (“AES”) with the licensed “eXConnect” aeronautical mobile-satellite service (“AMSS,” now termed earth stations aboard aircraft or “ESAA”) system¹ during the pendency of Panasonic’s license modification application.²

Pursuant to the existing STA, the Aura LE terminal operates with the Galaxy 17, Estrela do Sul 2, Telstar 11N and Eutelsat 172A satellites in accordance with the terms and conditions

¹ Panasonic Avionics Corporation, Radio Station Authorization, Call Sign E100089, File No. SES-MOD-20111128-01386 and other associated file numbers (“*Panasonic AMSS License*”); *Panasonic Avionics Corporation Application for Authority to Operate Up to 50 Technically Identical Aeronautical Mobile-Satellite Service Aircraft Earth Stations in the 14.0-14.4 GHz and 11.7-12.2 GHz Frequency Bands, Order and Authorization*, 26 FCC Rcd 12557 (Rel. Aug. 31, 2011).

² 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, Call Sign E100089, File No. SES-MFS-20120913-00818 (filed September 13, 2012) and associated file numbers.

set forth therein, prior Commission precedent governing U.S.-licensed AMSS systems and regulatory requirements designed to protect co-frequency services from harmful interference.³ This application requests renewal on the same terms and conditions as the previous STA, with the minor expansion of increasing the number of authorized terminals to 100.

To avoid duplicative pleading, Panasonic incorporates by reference the Aura LE antenna performance information provided in the prior STA request and the technical information associated with the Commission's prior grant of AMSS operating authority, which together fully detail the operational characteristics of the Aura LE antenna and the eXConnect System.⁴ This application focuses only on the need for renewal and expansion of the existing STA.

I. RENEWAL AND LIMITED EXPANSION OF SPECIAL TEMPORARY AUTHORITY WILL SERVE THE PUBLIC INTEREST

Panasonic is pleased to inform the Commission that operation of the Aura LE terminal onboard customer airline flights has been quite successful, the terminal is operating as expected with the global eXConnect System and the performance of the system has increased demand for in-flight connectivity services. Panasonic therefore requests renewal of the existing 60-day STA to permit continued operation of the Aura LE terminals during the pendency of Panasonic's modification application.

In addition, out of an abundance of caution and to accommodate ongoing customer installations, Panasonic requests a modest expansion of the STA to operate up to 100 terminals. Although it is unlikely that this number of terminals would operate simultaneously pursuant to STA authority (particularly since many aircraft are foreign-registered and operate outside the

³ Panasonic Avionics Corporation Application for Special Temporary Authorization, File No. SES-STA-20120913-00820, Call Sign E100089 (Sep. 13, 2012) (granted Mar. 22, 2013).

⁴ *Id.*; see also n.1, *supra*.

United States), Panasonic seeks to ensure that a sufficient number of terminals are covered in the event that a large portion of the installed base operates in or near the United States.

Importantly, the requested increase in the number of Aura LE terminals will not increase the potential for interference from the eXConnect System. Because eXConnect terminals transmit on individually assigned frequencies and time slots, only one terminal transmits at any given time and frequency regardless of the number of authorized terminals. Thus, there is no possibility of aggregate interference from multiple, simultaneously transmitting terminals.

Grant of the requested STA will afford U.S. airline passengers access to in-flight connectivity supported by the improved Aura LE terminal during the initial introduction of eXConnect service, and foreign airline passengers will enjoy more regularized access to the service in U.S. airspace. This, in turn, will enhance competition in the mobile broadband market by further enabling satellite-based in-flight connectivity to compete with carriers offering terrestrial-based and other aeronautical connectivity services.

II. CONCLUSION

The STA renewal and limited expansion requested herein will enable further introduction of the eXConnect service on an interim basis during the pendency of Panasonic's commercial license application for the Aura LE terminal, will enhance competition in the mobile broadband services market, will better position U.S. airlines to compete domestically and internationally, and will not increase the potential for interference from the eXConnect System. Given the significant public interest benefit, and in the absence of any public interest harm, Panasonic respectfully requests that the Commission grant an additional 60-day STA and permit operation of up to 100 Aura LE terminals with the eXConnect system.