

EXHIBIT

Purpose of STA Application

The Boeing Company (“Boeing”) herein seeks extension of its existing special temporary authorization (“STA”) for a renewal period of 180 days to continue to operate the Boeing Broadband Satellite Network (“BBSN”) in support of U.S. Air Force missions.¹

Background

On September 22, 2014, Boeing filed an application for authority to operate its existing BBSN pursuant to a license issued under the Commission’s recently adopted Earth Stations Aboard Aircraft (“ESAA”) rules.² On that same date, Boeing sought an STA for 60 days to permit continued operations while its ESAA application remains pending before the Commission.³

On October 1, 2014, the International Bureau (“IB”) granted a portion of Boeing’s STA application, allowing it to operate its BBSN for a period of 60 days using the E113WA satellite (previously known as SatMex 6) as a new point of communication to support its operations on behalf of the U.S. Government in South America.⁴ Boeing’s authority to operate the rest of its BBSN with eight other geostationary (“GSO”) satellites in the fixed satellite service (“FSS”) continues to be provided by experimental license call sign WC2XVE, which was issued by the Commission’s Office of Engineering and Technology (“OET”).

Discussion

As explained in the initial STA application, Boeing has operated in-flight broadband services for more than a decade. Boeing’s Connexion by Boeing system was the first satellite-based in-flight broadband service authorized by the IB in 2001.⁵ Since 2008, Boeing has operated under OET experimental authority pending the Commission’s adoption of ESAA rules.⁶ Based on discussions with IB and OET staff, Boeing filed its initial STA application with the IB in order to transfer all or portions its operating authority from its OET experimental license to an IB STA during the processing of its ESAA application.

¹ 47 C.F.R. § 25.120.

² *Revisions to Parts 2 and 25 of the Commission’s Rules to Govern the Use of Earth Stations Aboard Aircraft Communicating with Fixed-Satellite Service Geostationary-Orbit Space Stations Operating in the 10.95-11.2 GHz, 11.45-11.7 GHz, 11.7-12.2 GHz and 14.0-14.5 GHz Frequency Bands*, IB Docket No. 12-267, Notice of Proposed Rulemaking and Report and Order, FCC 12-161 (rel. Dec. 28, 2012) (“ESAA Order”).

³ The Boeing Company Request for Special Temporary Authorization and Expedited Treatment, File No. SES-STA-20140922-00747 (Sept. 22, 2014) (granted Oct. 1, 2014).

⁴ *See id.*

⁵ *See The Boeing Company*, Order and Authorization, 16 FCC Rcd. 22645 (Int’l Bur. 2001).

⁶ *See* Experimental License Call Sign WC2XVE.

Although Boeing initially sought an STA period of 60 days, Boeing now seeks an STA extension period of 180 days. This significantly longer period is warranted by the processing time that may be required for the IB to consider and grant Boeing's ESAA application.⁷ Although Boeing's ESAA application was filed on October 1, 2014, the application has not yet been placed on public notice for comment, likely reflecting the administrative difficulties for the IB of developing procedures for the review and licensing of this new type of satellite service. Boeing will therefore likely require an additional 180 days of temporary operating authority before its ESAA license is granted and its request for a longer STA period is therefore warranted.

Public Interest Statement

Boeing's BBSN exclusively serves the needs of the United States Air Force Air Materiel Command to support the operation of critically-important VIP/SAM (Very Important Personnel/Special Air Mission) aircraft used to transport senior leadership of the U.S. Government and the Department of Defense. The BBSN achieves near global coverage through the use of selected U.S. and foreign satellites. As with Boeing's experimental authorization, Boeing requests STA authority to operate the BBSN on a non-conforming, non-interference basis.

Grant of the requested STA would serve the public interest because the U.S. Air Force uses Boeing's service to support Homeland Security and National Defense efforts. These efforts have increased significantly in focus in the South America region and these efforts require secure, ubiquitous, and uninterrupted communications to VIP aircraft used by Federal Government leadership.

⁷ Application of The Boeing Company for Authority to Operate Up to 100 Earth Stations Aboard Aircraft, File No. SES-LIC-20140922-00748 (Filed Sep. 22, 2014) ("*Boeing ESAA Application*").