

EXPLANATORY STATEMENT

Row 44, Inc. hereby requests extension of Special Temporary Authority (“STA”) for an additional period of sixty (60) days to permit it to operate its licensed Ku-band network of Earth Stations Aboard Aircraft (“ESAA”) (Call Sign E080100) using the AMC-3 satellite at 67° W.L. as a point of communication. On May 1, 2015, Row 44 was granted authority pursuant to Section 25.120(b) of the FCC’s Rules for an initial 60-day period to operate using AMC-3 while its underlying modification application (File No. SES-MFS-20150424-00270) remains pending. *See* File No. SES-STA-20150424-00275. This authority was extended effective June 30, 2015 for an additional 60-day period, while the number of antennas authorized to use the AMC-3 satellite was increased from 50 to 100. *See* FCC File No. SES-STA-20150624-00365. Accordingly, the current STA expires on August 29, 2015.

On July 29, 2015, the underlying modification application was placed on FCC Public Notice. *See* Report No. Report No. SES-01769. As a result, the public comment period will end on Friday, August 28, 2015, one day before the current STA expires. However, as the modification application will not be grantable until the next business day, Monday, August 31, 2015, this application for further extension of the STA request is required to cover the period beginning at midnight on August 30, 2015 until action on the application is taken, whether on August 31, 2015 or later.

Row 44 has been operating successfully using the AMC-3 capacity for nearly two months with no reported adverse effect on other authorized operations. Row 44’s STA operations otherwise remain consistent with all terms and conditions of its current license, and are limited to conventional Ku-band capacity frequencies at 11.7 to 12.2 GHz (downlink) and 14.0 to 14.5 GHz (uplink), as proposed in the pending modification application. The additional capacity covered by the STA has been particularly important for the company’s operations because of increasing passenger demand for in-flight entertainment and Internet access at a time when other capacity options are limited. Grant of an additional 60-day STA period is therefore critical to maintain service availability, and will affirmatively serve the public interest by helping to meet airline passenger demand for connectivity.

Row 44 acknowledges that favorable FCC action on this STA request would be without prejudice to the ultimate determination the FCC will make regarding the pending modification application. In addition, Row 44 acknowledges that any action taken pursuant to a grant of the requested STA will continue to be at its own risk.