

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:  
Request for 30-Day STA Using Riverside, CA Earth Station E040125 for GSAT-18 LEOP

**I. Applicant**

<b>Name:</b>	Intelsat License LLC	<b>Phone Number:</b>	703-559-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	703-559-8539
<b>Street:</b>	c/o Intelsat Corporation 7900 Tysons One Place	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>	Susan H. Crandall		



File # SES-STA20160824-00740  
E 04025  
Call Sign E 04025 Grant Date 9-19-16  
(or other identifier)

Term Dates  
From: 10-4-16 To: 11-3-16  
Approved: [Signature]

<b>2. Contact</b>			
<b>Name:</b>	Cynthia J. Grady	<b>Phone Number:</b>	703-559-6949
<b>Company:</b>	Intelsat Corporation	<b>Fax Number:</b>	703-559-8539
<b>Street:</b>	7900 Tysons One Place	<b>E-Mail:</b>	cynthia.grady@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>		<b>Relationship:</b>	Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)			
3. Reference File Number or Submission ID			
4a. Is a fee submitted with this application?			
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).			
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee			
<input type="radio"/> Other (please explain):			
4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station			
5. Type Request			
<input type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other			
6. Requested Use Prior Date			
7. City Nuevo			
8. Latitude (dd mm ss.s h) 33 47 43.6 N			

9. State CA	10. Longitude (dd mm ss.s h) 117 5 20.4 W
11. Please supply any need attachments. Attachment 1: STA Request Attachment 2: Exhibit A Attachment 3: Exhibit B	
12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.) <div style="border: 1px solid black; padding: 5px;"> <p>Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing October 4, 2016, to use its Riverside, California C-band earth station, call sign E040125, to provide launch and early orbit phase services for the GSAT-18 satellite. GSAT-18 is expected to be launched October 4, 2016.</p> </div>	
13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; party to the application; for these purposes. <p style="text-align: center;">Yes <input checked="" type="radio"/> No <input type="radio"/></p>	
14. Name of Person Signing Cynthia J. Grady	15. Title of Person Signing Regulatory Counsel, Intelsat Corporation
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).	

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**

August 24, 2016

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Request for Special Temporary Authority  
Riverside, California Earth Station E040125

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, commencing October 4, 2016, to use its Riverside, California C-band earth station—call sign E040125—to provide launch and early orbit phase (“LEOP”) services for the GSAT-18 satellite. GSAT-18 is expected to be launched October 4, 2016.<sup>2</sup> The LEOP period is expected to last approximately 10 days.<sup>3</sup>

The GSAT-18 LEOP operations will be performed in the following frequency bands: 6415.00 MHz and 6421.48 MHz in the uplink (RHCP), and 4187.52 MHz and 4155.768 MHz in the downlink (LHCP). The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.<sup>4</sup> All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

The 24x7 contact information for the GSAT-18 LEOP mission is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary)  
(310) 525-5591 – West Coast Operations Center (back-up)

Request to speak with Harry Burnham or Kevin Bell.

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<sup>1</sup> Intelsat has filed its STA request, an FCC Form 159, a \$195.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

<sup>2</sup> The permanent orbital location for GSAT-18, which Intelsat understands is licensed by India, will be 74.0° E.L. The in-orbit testing location will be 48.0° E.L.

<sup>3</sup> Intelsat is seeking authority for 30 days to accommodate a possible launch delay.

<sup>4</sup> Indian Space Research Organisation (“ISRO”), the manager of the GSAT-18 mission, will handle the coordination.

Ms. Marlene H. Dortch  
August 24, 2015  
Page 2

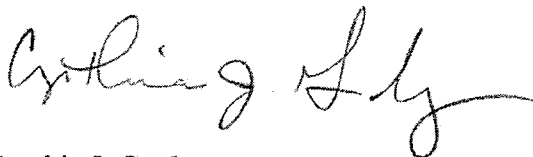
In further support of this request, Intelsat hereby attaches Exhibits A and B, which contain technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility, as well as a waiver request. Intelsat also notes that for purposes of the GSAT-18 LEOP mission, it is seeking to operate in the frequencies listed in the request at power levels not to exceed 31.8 dBW. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

Finally, Intelsat clarifies that during the GSAT-18 LEOP mission, ISRO will serve as the mission manager. ISRO will build and send the commands to the Intelsat antenna, which will process and execute the commands. Telemetry received by Intelsat will be forwarded to ISRO. Intelsat will perform the ranging sessions by sending a tone to the spacecraft periodically. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

Grant of this STA request will allow Intelsat to help launch the GSAT-18 satellite. This, in turn, will result in the provision of a replacement satellite from the 74.0° E.L. orbital location for a currently operational satellite and thereby promotes the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,



Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais

## Exhibit A

### PETITION FOR WAIVER OF SECTIONS 25.137 AND 25.114

Pursuant to Section 25.137 of the Federal Communications Commission's ("Commission" or "FCC") rules, earth station applicants "requesting authority to operate with a non-U.S. licensed space station *to serve the United States*" must demonstrate that effective competitive opportunities exist and must provide the same technical information required by Section 25.114 for U.S.-licensed space stations.<sup>1</sup> Intelsat License LLC ("Intelsat") herein seeks authority to provide launch and early orbit phase ("LEOP") services—not commercial services—to the United States, and thus believes that Section 25.137 does not apply.<sup>2</sup>

To the extent the Commission determines, however, that Intelsat's request for authority to provide LEOP services on a special temporary basis is a request to serve the United States with a non U.S.-licensed satellite, Intelsat respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission's rules.<sup>3</sup> The Commission may grant a waiver for good cause shown.<sup>4</sup> The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.<sup>5</sup> In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>6</sup> Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause exists for a waiver of both Section 25.137 and Section 25.114. With respect to Section 25.114, Intelsat seeks authority only to provide LEOP services for the GSAT-18 satellite. The information sought by Section 25.114 is not relevant to LEOP services. Moreover, Intelsat does not have—and would not easily be able to obtain—such information because Intelsat is not the operator of the GSAT-18 satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with the Indian Space Research Organisation ("ISRO"), the manufacturer of the GSAT-18 satellite, to conduct LEOP services for the satellite.

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<sup>1</sup> 47 C.F.R. § 25.137 (emphasis added).

<sup>2</sup> See *EchoStar Satellite Operating Company Application for Special Temporary Authority Related to Moving the EchoStar 6 Satellite from the 77° W.L. Orbital Location to the 96.2° W.L. Orbital Location, and to Operate at the 96.2° W.L. Orbital Location*, DA 13-593, File No. SAT-STA-20130220-00023 (released Apr. 1, 2013) (noting that operating TT&C earth stations in the United States with a foreign-licensed satellite does not constitute "DBS service").

<sup>3</sup> 47 C.F.R. §§ 25.137 and 25.114.

<sup>4</sup> 47 C.F.R. §1.3.

<sup>5</sup> *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

<sup>6</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

The information that Intelsat is not including is not required to determine potential harmful interference. The Schedule S information for this satellite would pertain to the operation of the GSAT-18 satellite at its final orbital location. However, the present application for LEOP services involves communications *prior* to the satellite attaining its final location in the geostationary orbit. In other words, during the LEOP mission, the earth station will not be communicating with a satellite located in the geostationary orbit. Rather, it will be transmitting to a satellite traveling on its “transfer orbit” or “LEOP path,” which starts immediately following its separation from a launch vehicle, and ends when the satellite reaches its geostationary orbital location. Moreover, as with any STA, Intelsat will perform the LEOP services on a non-interference basis.

Because it is not relevant to the service for which Intelsat seeks authorization, and because obtaining the information would be a hardship, Intelsat seeks a waiver of all the information required by Section 25.114. Intelsat has provided in this STA request the required technical information that is relevant to the LEOP services for which Intelsat seeks authorization.

Good cause also exists to waive Section 25.137. Section 25.137 is designed to ensure that “U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services” in other countries. Here, there is no service being provided by the satellite; it is simply being placed in its orbital location after separating from the launch vehicle. Thus, the purpose of the information required by Section 25.137 is not implicated here. For example, Section 25.137(d) requires earth station applicants requesting authority to operate with a non-U.S.-licensed space station that is not in orbit and operating to post a bond.<sup>7</sup> The underlying purpose in having to post a bond—*i.e.*, to prevent warehousing of orbital locations by operators seeking to serve the United States—would not be served by requiring Intelsat to post a bond in order to provide approximately ten days of LEOP services to the GSAT-18 satellite.

It is Intelsat’s understanding that GSAT-18 is licensed by India, which is a WTO-member country. It is also Intelsat’s understanding that at its permanent location of 74.0° E.L., GSAT-18 will not see the United States. Thus, the purposes of Section 25.137—to ensure that U.S. satellite operators enjoy “effective competitive opportunities” to serve foreign markets and to prevent warehousing of orbital locations serving the United States—will not be undermined by grant of this waiver request.

Finally, Intelsat notes that it expects to operate with the GSAT-18 satellite using its U.S. earth station for a period of approximately 10 days. Requiring Intelsat to obtain copious technical and legal information from an unrelated party, where there is no risk of harmful interference and the operations will cease after approximately 10 days, would pose undue hardship without serving underlying policy objectives. Given these particular facts, the waiver sought herein is plainly appropriate.

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<sup>7</sup> See 47 C.F.R. §25.137(d)(4).



Prepared By

**COMSEARCH**

19700 Janelia Farm Boulevard, Ashburn, VA 20147  
(703)726-5500 <http://www.comsearch.com>

Prepared For

**Intelsat License LLC  
Nuevo, California**

Temporary Transmit-Only Earth Station  
Operation Dates: 07/12/2016 - 07/22/2016

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations. Verbal and written coordination was conducted with the below listed carriers on May 11, 2016.

Company

ABC Holding Company Inc.  
AirSites2000, LLC  
Alltel Comm Southwest Holdings Inc.  
Anaheim City, of  
Arizona Public Service Company (APS)  
Arizona, State Of  
BNSF Railway Company  
CCO SoCal I, LLC  
California, State of  
Calvary Chapel of Costa Mesa  
Cellco Partnership - Southern California  
City of Casa Grande  
City of Los Angeles Dept Water & Power  
City of Montebello  
City of Yuma  
Coachella Valley Water District  
Coast Community College District  
Commnet Four Corners, LLC  
DM Ventures, Inc. dba Warp2Biz  
DRS Technical Services  
Entravision Holdings, LLC  
Federal Communication Commission  
Fisher Wireless Services, Inc.  
Fresno MSA Limited Partnership  
Gila River Cellular General Partnership  
Glendale, City of  
Global Telecom & Technology Americas, In  
GovNET Licenses LLC  
ION Media Los Angeles License, Inc.  
KTLA, LLC  
Kern Ed Telecom Consortium  
Kern, County of  
LDM Engineering  
Lightwave Broadband LLC  
Los Angeles City Info Technology Agency

Los Angeles County Dept of Public Works  
Los Angeles County FCC Licensing Section  
Los Angeles SMSA Ltd. Partnership  
MHO Networks  
MOBILE RELAY ASSOCIATES INC  
Maricopa County Wireless Systems  
Metropolitan Water Dist of So California  
NRJ TV LA License Co, LLC  
New Cingular Wireless PCS LLC - AZ  
New Cingular Wireless PCS - Los Angeles  
New Cingular Wireless PCS LLC - N CAL  
New Cingular Wireless PCS LLC -San Diego  
Nextel License Holdings 4 Inc.  
Nextel of California Inc.  
Norris, Samuel O  
Northrop Grumman Systems Corp.  
Olympic Wireless, LLC  
Orange, County of, CA  
Pacific Bell Tel Com dba AT&T California  
Phoenix, City of  
Pinal, County of  
QUALCOMM INC.  
Qwest Corporation  
Regional 3Cs  
Riverside, County of  
San Bernardino County of California  
San Diego Broadband  
San Diego County Water Authority  
San Diego Gas & Electric Company  
San Diego, City of  
San Diego, County of  
Skyriver Communications  
Southern California Edison Company  
Southern California Gas Company  
Southern California Regional Rail Auth.  
Sprint Spectrum L.P.  
Station Venture Operations, LP  
T-Mobile License LLC  
TV MICROWAVES CO  
Table Top Telephone Company  
Telink Networks SW, LLC  
Time Warner Cable Pacific West LLC  
Tucson Electric Power Company  
Turn Wireless, LLC  
Ultimate Internet Access, Inc  
Union Pacific Railroad Company  
University of California, HPWREN  
Vectus, Inc  
Verizon California Inc.  
Verizon Wireless (VAW) LLC (Southern CA)  
Verizon Wireless (VAW) LLC-N CA/NV  
Verizon Wireless(VAW) LLC-AZ/CO/NM/NV/UT  
Western Technical Services  
White, Fred K

There are no unresolved interference objections with the station contained in these applications.

The following section presents the data pertinent to frequency coordination of the earth station that was circulated to all carriers within its coordination contours.

**COMSEARCH**  
**Earth Station Data Sheet**

19700 Janelia Farm Boulevard, Ashburn, VA 20147  
(703)726-5500 <http://www.comsearch.com>

Date: 06/08/2016  
Job Number: 160511COMSGE04

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**Administrative Information**

Status TEMPORARY (Operation from 07/12/2016 to 07/22/2016)  
Call Sign E040125  
Licensee Code INTELS  
Licensee Name Intelsat License LLC

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**Site Information** **NUEVO, CA**

Venue Name  
Latitude (NAD 83) 33° 47' 43.6" N  
Longitude (NAD 83) 117° 5' 20.4" W  
Climate Zone A  
Rain Zone 4  
Ground Elevation (AMSL) 566.62 m / 1859.0 ft

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**Link Information**

Satellite Type Geostationary  
Mode TO - Transmit-Only  
Modulation Analog and Digital  
Satellite Arc 45° W to 170° West Longitude  
Azimuth Range 100.2° to 247.2°  
Corresponding Elevation Angles 6.2° / 22.0°  
Antenna Centerline (AGL) 7.32 m / 24.0 ft

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**Antenna Information** **Transmit - FCC32**

Manufacturer TIW  
Model 11 Meter  
Gain / Diameter 55.5 dBi / 11.0 m  
3-dB / 15-dB Beamwidth 0.29° / 0.54°

Max Available RF Power (dBW/4 kHz) 8.6  
(dBW/MHz) 32.6

Maximum EIRP (dBW/4 kHz) 64.1  
(dBW/MHz) 88.1  
(dBW) 87.4

Interference Objectives: Long Term -154.0 dBW/4 kHz 20%  
Short Term -131.0 dBW/4 kHz 0.0025%

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**Frequency Information** **Transmit 6.1 GHz**

Emission / Frequency Range (MHz) 850KFXD / 6415.0 - 6421.48

Max Great Circle Coordination Distance 491.7 km / 305.5 mi  
Precipitation Scatter Contour Radius 316.8 km / 196.8 mi

<b>Coordination Values</b>	<b>NUEVO, CA</b>
Licensee Name	Intelsat License LLC
Latitude (NAD 83)	33° 47' 43.6" N
Longitude (NAD 83)	117° 5' 20.4" W
Ground Elevation (AMSL)	566.62 m / 1859.0 ft
Antenna Centerline (AGL)	7.32 m / 24.0 ft
Antenna Model	TIW 11 Meter
Antenna Mode	Transmit 6.1 GHz
Interference Objectives: Long Term	-154.0 dBW/4 kHz 20%
Short Term	-131.0 dBW/4 kHz 0.0025%
Max Available RF Power	8.6 (dBW/4 kHz)

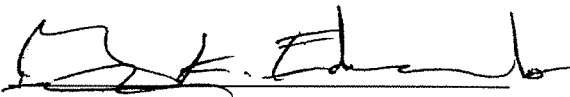
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	0.91	100.15	-10.00	160.90
5	2.23	95.18	-10.00	125.83
10	1.88	90.19	-10.00	133.16
15	2.42	85.20	-10.00	122.25
20	2.49	80.21	-10.00	120.85
25	2.56	75.22	-10.00	119.49
30	3.50	70.22	-10.00	102.07
35	3.34	65.23	-10.00	105.02
40	3.36	60.23	-10.00	104.68
45	3.28	55.24	-10.00	106.09
50	2.88	50.27	-10.00	113.58
55	2.50	45.31	-9.40	122.87
60	2.77	40.31	-8.14	122.67
65	3.44	35.29	-6.69	115.99
70	3.10	30.33	-5.05	128.10
75	3.19	25.36	-3.10	133.79
80	3.76	20.33	-0.70	132.86
85	3.33	15.45	2.28	152.87
90	3.39	10.56	6.41	174.12
95	2.51	6.34	11.94	220.14
100	2.99	3.18	19.45	491.65
105	3.63	5.38	13.72	205.53
110	3.84	9.29	7.80	171.48
115	3.70	13.36	3.86	152.77
120	3.87	17.17	1.13	137.08
125	3.84	21.02	-1.07	130.12
130	4.49	24.32	-2.65	114.61
135	3.88	28.30	-4.29	117.10
140	4.24	31.47	-5.45	107.49
145	4.11	34.76	-6.53	105.27
150	4.48	37.41	-7.32	100.00
155	4.67	39.84	-8.01	100.00
160	4.09	42.53	-8.72	100.00
165	4.55	43.90	-9.06	100.00
170	4.85	44.86	-9.30	100.00
175	5.79	44.68	-9.25	100.00
180	6.19	44.52	-9.21	100.00
185	6.91	43.57	-8.98	100.00

<b>Coordination Values</b>		<b>NUEVO, CA</b>	
Licensee Name		Intelsat License LLC	
Latitude (NAD 83)		33° 47' 43.6" N	
Longitude (NAD 83)		117° 5' 20.4" W	
Ground Elevation (AMSL)		566.62 m / 1859.0 ft	
Antenna Centerline (AGL)		7.32 m / 24.0 ft	
Antenna Model		TIW 11 Meter	
Antenna Mode		Transmit 6.1 GHz	
Interference Objectives:	Long Term	-154.0 dBW/4 kHz	20%
	Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power		8.6 (dBW/4 kHz)	

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
190	7.27	42.53	-8.72	100.00
195	6.99	41.64	-8.49	100.00
200	6.27	40.64	-8.22	100.00
205	5.71	38.99	-7.77	100.00
210	5.71	36.45	-7.04	100.00
215	6.70	32.84	-5.91	100.00
220	7.49	29.16	-4.62	100.00
225	7.03	26.16	-3.44	100.00
230	5.65	23.57	-2.31	102.80
235	6.10	19.95	-0.50	105.35
240	5.73	17.76	0.76	114.08
245	5.59	16.57	1.52	118.52
250	5.18	17.07	1.20	121.20
255	4.95	18.72	0.19	119.58
260	4.51	21.57	-1.35	119.32
265	4.74	24.62	-2.78	110.78
270	4.38	28.54	-4.39	109.45
275	4.51	32.48	-5.79	102.47
280	4.14	36.88	-7.17	102.48
285	3.19	41.60	-8.48	113.55
290	2.77	46.16	-9.61	117.06
295	1.04	51.16	-10.00	154.91
300	0.82	55.70	-10.00	165.96
305	0.00	60.40	-10.00	212.66
310	0.00	64.94	-10.00	212.66
315	0.00	69.50	-10.00	212.66
320	0.00	74.10	-10.00	212.66
325	0.00	78.71	-10.00	212.66
330	0.00	83.34	-10.00	212.66
335	0.00	87.97	-10.00	212.66
340	0.00	92.60	-10.00	212.66
345	0.00	97.24	-10.00	212.66
350	0.00	101.86	-10.00	212.66
355	0.00	105.10	-10.00	212.66

## Certification

I hereby certify that I am the technically qualified person responsible for the preparation of the frequency coordination data contained in this report. I am familiar with Parts 101 and 25 of the FCC Rules and Regulations and I have either prepared or reviewed the frequency coordination data submitted with this report, and that it is complete and correct to the best of my knowledge and belief.

BY: 

Gary K. Edwards  
Senior Manager  
COMSEARCH  
19700 Janelia Farm Boulevard  
Ashburn, VA 20147

DATED: June 8, 2016