

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
STA for AMC-6 @ 67WL (Dec. 2016)

1. Applicant

Name: Row 44 Inc. Phone Number: 310-437-6000
DBA Name: Phone Number:
Street: c/o Global Eagle Entertainment E-Mail: smclellan@geemedia.com
Inc. 4553 Glencoe Avenue, Suite 300
City: Marina Del Rey State: CA
Country: USA Zipcode: 90292
Attention: Mr Simon McLellan



File # SES-STA-20161207-00932

Call Sign E080100 Grant Date 12/8/2016
(or other identifier)

Term Dates

From 12/09/2016 To: 1/8/2017

Approved: Paul E. Hayes

All operations are on a NIB & NPB basis
PEK

2. Contact	
Name: David S. Keir	Phone Number: 202-429-8970
Company: Lerman Senter PLLC	Fax Number: 202-293-7783
Street: 2001 L Street, NW Suite 400	E-Mail: dkeir@lermansenter.com
City: Washington	State: DC
Country: USA	Zipcode: 20036 -4946
Attention:	Relationship: 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 12/09/2016	
7. City	
8. Latitude (dd mm ss.s h) 0 0 0.0	

9. State	10. Longitude (dd mm ss.s h) 0 0 0.0
11. Please supply any need attachments. Attachment 1: Explanatory Stmt Attachment 2: Attachment 3:	
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;">Request for special temporary authority for an initial period of 30 days commencing December 9, 2016 to operate on an interim basis using space segment capacity on AMC-6 at 67WL following the movement of AMC-3 satellite to 72WL. See Attached Narrative.</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"; for these purposes. Yes <input checked="" type="radio"/> No <input type="radio"/>	
14. Name of Person Signing Simon McLellan	15. Title of Person Signing Chief Engineer
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).	

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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.

EXPLANATORY STATEMENT

Row 44, Inc., pursuant to Section 25.120(b) of the FCC's Rules, hereby requests Special Temporary Authority ("STA") for a period of thirty (30) days to operate its licensed Ku-band network of Earth Stations Aboard Aircraft ("ESAA") (Call Sign E080100), using space segment capacity on the SES, S.A. ("SES") AMC-6 satellite ("AMC-6") at 67° W.L. The capacity on AMC-6 is to be used as interim replacement capacity for space segment on the AMC-3 satellite, to which Row 44 is currently authorized to transmit under its license and which is in the process of being relocated from 67° W.L. to 72° W.L. Row 44 expects to transition capacity to other satellites during 2017 pursuant to a forthcoming license modification application, which will seek authority for a new antenna and additional points of communication.

Row 44's operations on AMC-6 at 67° W.L. will be subject to the existing coordination certification letter from SES with respect to AMC-3 under Section 25.227(b)(2) of the Commission's Rules and with all other conditions of its existing license. In providing its fleet management notification under Section 25.118(e) of the Commission's Rules, SES expressly stated that "it will operate within the technical parameters currently licensed and coordinated for AMC-3 ... at that location." FCC Public Notice, "Policy Branch Information: Satellite Space Station Applications Accepted for Filing," Report No. SAT-01194 (released October 21, 2016). Accordingly, there will be no change in Row 44's operations at this orbital location and the coordination certification provided for this slot remains valid.

Under Section 25.120(b)(1) of the FCC's Rules, the International Bureau may grant an STA when the public interest supports the relief requested, and/or delay in the institution of temporary operations would be contrary to the public interest. *See* 47 C.F.R. § 25.120(b)(1). Such authority may be granted for a period not to exceed 30 days "if the STA request has not been placed on public notice, and an application for regular authority is not contemplated." *See* 47 C.F.R. § 25.120(b)(4). Because Row 44 will not be filing an application for permanent access to AMC-6 at 67° W.L., its request is thus limited to thirty (30) days duration. Row 44 anticipates that operations using AMC-6 will continue for a period of months, and that additional STA grants of this duration will be required.

Grant of the additional authority requested here will promote the public interest by permitting Row 44 to continue providing service to its customers using capacity on the AMC-6 satellite in lieu of capacity on AMC-3. Use of AMC-6 will help maintain effective coverage of all U.S. domestic routes currently served by Row 44. Grant of the requested STA is consistent with Commission policy and will not adversely affect other authorized operations. Row 44 acknowledges that any action taken pursuant to a grant of the requested STA will be at its own risk, and respectfully requests that the FCC grant it authority no later than December 9, 2016, for an initial period of thirty (30) days, to use the AMC-6 satellite as a point of communication in the conventional Ku-band in the United States using TECOM antennas now operating under its FCC ESAA network license.