

E080100 SES-STA-20161223-00972 IB2016002807  
Row 44 Inc.

Approved by OMB  
3060-0678

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-3 @ 72WL (Dec. 2016)

**1. Applicant**

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



File # SES-STA-20161223-00972

Call Sign E080100 Grant Date 1/6/2017  
(or other identifier)

Term Dates

From 1/8/2017 To 3/9/2017

Approved: Paul E. Hayes

10481

Applicant: Row 44 Inc.  
File Number: SES-STA-20161223-00972  
Call Sign: E080100

Row 44, Inc., is granted a special temporary authority for 60 days, beginning January 8, 2017, to operate earth stations aboard aircraft with the AMC-3 satellite at the 72° W. L. orbital location, in the 14.05-14.47 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) frequency bands, under the following conditions:

1. Operations under this authority are on a non-interference basis only.
2. Operations under this authority are on a non-protected basis only.
3. In the event that there is a report of interference, Row 44 Inc.'s must immediately terminate transmissions and notify the FCC in writing.
4. The operations will be coordinated with all operators of satellites that use the same frequency bands and are in the relocation path. 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.
5. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Row 44 Inc.'s risk.
6. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately.



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Call Sign E080100 Grant Date 1/6/2017  
(or other identifier)  
Term Dates  
From 1/8/2017 To: 3/9/2017  
Approved: Paul E. Blas

<b>2. Contact</b>			
<b>Name:</b>	David S. Keir	<b>Phone Number:</b>	202-429-8970
<b>Company:</b>	Lerman Senter PLLC	<b>Fax Number:</b>	202-293-7783
<b>Street:</b>	2001 L Street, NW Suite 400	<b>E-Mail:</b>	dkeir@lermansenter.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20036 -4946
<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 checked="" type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input type="radio"/> Other			
6. Requested Use Prior Date		8. Latitude	
01/08/2017		(dd mm ss.s h) 0 0 0.0	
7. City			

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: Coordination Cert.      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 sixty (60) days commencing January 8, 2017 to operate using space segment capacity on AMC-3 at 72WL prior to action on Row 44's forthcoming application to modify its license to specify use of AMC-3 at 72WL (in lieu of its prior location at 67WL). 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.**



**Kimberly M. Baum**  
Vice President Spectrum Management & Development, Americas

**Federal Communications Commission  
International Bureau  
445 12th Street, S.W.  
Washington, D.C. 20554**

TBD November 2016

Subject: Engineering Certification of SES Americom, Inc. for the AMC-3 Satellite

To whom it may concern,

This letter confirms that SES is aware that Global Eagle Entertainment, Inc. ("GEE"), licensed by the Federal Communications Commission ("FCC") as Row 44, Inc., is seeking FCC authority to operate an additional transmit/receive remote terminal in conjunction with its blanket authorization to operate technically identical Ku-band Earth Stations Aboard Aircraft ("ESAA") pursuant to ITU RR 5.504A and Section 25.227 of the Commission's rules (Call Sign E080100). Row 44 seeks authority for GEE's new ESAA terminals to communicate with the AMC-3 satellite at 67° W.L., under the current ESAA rules, including Section 25.227.

Based upon the contents of the applications (we understand that Row 44 will seek both an experimental license and the modification of its ESAA license) and the representations made to SES by GEE concerning how it will operate on AMC-9 according to its letter dated November TBD, 2016:

- SES certifies that it has completed coordination as required under the FCC's rules and that the power density levels specified by GEE are consistent with any existing coordination agreements to which SES is a party with adjacent satellite operators within +/- 6 degrees of orbital separation from AMC-3.
- If the FCC authorizes the operations proposed by GEE, SES will include the power density levels specified by GEE in all future satellite network coordination with other operators of satellites adjacent to AMC-3.

SES has also reviewed the discussion in the applications regarding the off-axis EIRP density of Row 44 antennas communicating with AMC-3 in directions other than along the GSO plane. SES is of the view that the non-compliant emissions would not create interference to Ku-band geostationary satellites.

Yours Sincerely,

  
Kimberly M. Baum

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USA

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### EXPLANATORY STATEMENT

Row 44, Inc., pursuant to Section 25.120(b) of the FCC's Rules, hereby requests Special Temporary Authority ("STA") for an initial period of sixty (60) 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-3 satellite ("AMC-3") at 72° W.L. Row 44 is currently authorized to transmit to AMC-3 at the 67° W.L. orbital location as part of its existing ESAA license. The AMC-3 satellite, however, is in the process of being permanently relocated to 72° W.L. Capacity on AMC-6 at 67° W.L. is currently being used on an interim basis pursuant to STA (*see* FCC File No. SES-STA-20161207-00932) as replacement capacity for space segment on AMC-3, but Row 44 expects to transition back to AMC-3 once it is on station and operating at its new location, as early as January 8, 2017. Row 44 also intends to file within the initial term of the requested STA an application to modify its license to specify long-term operation on AMC-3 at 72° W.L.

Row 44's operations on AMC-3 at 72° W.L. will not cause harmful interference to any adjacent satellites operating in accordance with FCC's two-degree spacing policy. Attached to this STA request is a coordination certification letter from SES, in accordance with Sections 25.227(b)(2) of the Commission's Rules, covering the proposed operation, which will also be consistent with its existing, long-term coordination agreements with the National Science Foundation and the National Aeronautics and Space Administration.

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 60 days where the applicant has filed, *or plans to file*, a request for permanent authority for the parameters and facilities requested. *See* 47 C.F.R. § 25.120(b)(3). This is the case here, where Row 44 anticipates submitting an application to modify its license permanently to permit access to AMC-3 at its new 72° W.L. orbital location within the initial STA term sought in this request.

Grant of the authority requested here will promote the public interest by permitting Row 44 to continue providing service to its customers using capacity on the AMC-3 satellite at 72° W.L. in lieu of its prior use of AMC-3 at 67° W.L. and its current use of AMC-6 at that location under separate STA. Continued use of AMC-3 at its new orbital location will 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 as of January 8, 2017, for an initial period of sixty (60) days, to use the AMC-3 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.