

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

AC BidCo LLC (“AC BidCo”), which holds a license to operate an earth station aboard aircraft (“ESAA”) network,¹ hereby requests special temporary authority (“STA”) for a period of 30 days commencing as soon as possible but no later than March 28, 2017, to permit up to 300 AeroSat model HR6400 ESAA terminals to communicate in the conventional Ku-band with the U.S.-licensed AMC-6 satellite located at 67° W.L. Grant of the requested STA will serve the public interest by allowing AC BidCo to meet customer demand for additional capacity over North America, including in U.S. airspace.

Background

AC BidCo is authorized to operate Ku-band terminals with specified satellites for ESAA service in U.S. airspace, foreign airspace, and the airspace over international waters. AC BidCo’s license was issued based on demonstration that the proposed network would enhance competition in the provision of in-flight broadband service to air travelers and airline crew members and that the planned operations were fully consistent with technical standards designed to ensure protection of other authorized communications networks.

AC BidCo’s authority permits it to use the AMC-6 satellite at 67° W.L., but only with the 0.74 meter ThinKom model 2Ku antennas designated as AES2 on the AC BidCo ESAA License. SES Americom, Inc. (“SES”) previously operated the AMC-3 satellite at 67° W.L., and the AC BidCo License authorized the AES2 terminals to communicate with AMC-3. Last year SES notified the Commission of its intent to relocate AMC-6 to 67° W.L. to take the place of AMC-3 under the Commission’s fleet management procedures, and SES later advised the Commission that the relocation had been completed.² As a result of the satellite change, the AC BidCo ESAA traffic that had been carried by AMC-3 at 67° W.L. was transferred to the AMC-6 satellite effective December 10, 2016.

Section 25.118(a)(3) specifies that earth station licensees may implement changes in points of communication without prior consent of the Commission if the change results from a space station relocation made pursuant to the fleet management procedures.³ As required by that rule, AC BidCo notified the Commission of this change in points of communication as part of a

¹ See Call Sign E120106, File No. SES-MFS-20160824-00738, granted Dec. 13, 2016 (the “AC BidCo ESAA License”).

² *SES Americom, Inc.*, Call Sign S2347, File No. SAT-MOD-20161014-00098; letter from Karis A. Hastings, Counsel for SES Americom, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, File No. SAT-MOD-20161014-00098, dated Dec. 12, 2016.

³ See 47 C.F.R. Section 25.118(a)(3)(i).

modification application that is currently pending before the Commission.⁴ Consistent with the scope of AC BidCo's prior authority to use AMC-3, AC BidCo can only use the ThinKom AES2 terminals to communicate with AMC-6.

In order to enhance and expand its ESAA operations, AC BidCo seeks STA to add AMC-6 as a point of communication for the AeroSat model HR6400ESAA terminals designated as AES1 on the AC BidCo ESAA License.

STA Request

AC BidCo seeks STA to allow its AeroSat AES1 terminals to commence communications with AMC-6 in the near term in order to meet customer demand. Because AMC-6 is a U.S. licensed satellite, full technical data regarding the satellite is already on file with the Commission,⁵ and AC BidCo incorporates that information by reference herein. AC BidCo is also attaching a letter confirming that its proposed ESAA operations are consistent with SES's coordination agreements with operators of the satellites within six degrees on either side of AMC-6. The technical parameters of the proposed operations of the AeroSat terminals with AMC-6 are consistent with those specified in the AC BidCo ESAA License.⁶

AC BidCo seeks authority to use AMC-6 capacity for ESAA operations on a primary basis in the 14-14.5 GHz uplink spectrum and in the 11.7-12.2 GHz downlink spectrum, consistent with the AMC-6 License and the Commission's orders in the ESAA proceeding.⁷ Communications with the satellite will be supported by a teleport in Perris, CA, Call Sign E940448.

AMC-6 will provide coverage of North America. AC BidCo requires access to this capacity to ensure that it has sufficient bandwidth to meet near-term customer demand for in-flight connectivity.

⁴ See Call Sign E120106, File No. SES-MFS-20170109-00015.

⁵ *SES Americom, Inc.*, Call Sign S347, File Nos. SAT-MOD-20161014-00098, license reissued as modified Jan. 15, 2017 ("AMC-6 License").

⁶ Operations of the AeroSat AES1 terminals with AMC-6 will not involve any increase in the maximum off-axis EIRP density levels previously described to the Commission for the AeroSat terminal.

⁷ *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 14-14.5 GHz Frequency Bands*, Notice of Proposed Rulemaking and Report and Order, IB Docket Nos. 12-376 & 05-20, 27 FCC Rcd 16510 (2012); Second Report and Order and Order on Reconsideration, IB Docket No. 12-376, 29 FCC Rcd 4226 (2014).

AC BidCo emphasizes that the scope of this STA request is limited. AC BidCo is only seeking authority to add AMC-6 as an authorized point of communication for a limited number of ESAA terminals. AC BidCo is otherwise prepared to operate consistently with the terms and conditions set forth in the existing AC BidCo ESAA License. In addition, AC BidCo is willing to operate pursuant to the STA on an unprotected, non-harmful interference basis.

Grant of the requested STA is consistent with Commission policy and will not adversely affect other authorized operations. AC BidCo's proposed operations with AMC-6 are consistent with SES's coordination agreements with adjacent satellite operators and will also conform to the terms of AC BidCo's agreements with the National Science Foundation and the National Aeronautics and Space Administration, as required by the AC BidCo ESAA License.⁸ In addition, AC BidCo will comply with power flux density limits to protect terrestrial services outside the U.S.

Grant of the proposed STA will allow AC BidCo to respond to urgent customer demand for increased capacity on important air transport routes over the U.S. and the remainder of North America, promoting competition in the provision of aeronautical services and expanding the availability of in-flight broadband to air travelers and crew members.

⁸ AC BidCo ESAA License at 11, condition 90304.



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

16 March 2017

Subject: Engineering Certification of SES Americom, Inc. for the AMC-6 Satellite

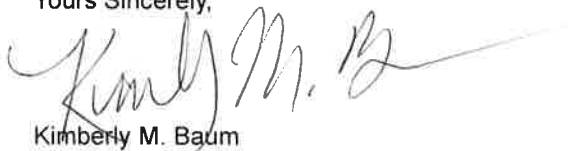
To whom it may concern,

This letter confirms that SES is aware that AC BidCo LLC. ("AC BidCo"), licensed by the Federal Communications Commission ("FCC") as AC BidCo LLC, is planning to file an application seeking a modification to its blanket authorization (the "Modification Application") 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 E120106). The Modification Application will seek authority for AC BidCo's ESAA terminals to communicate with the AMC-6 satellite at 67° W.L., under the current ESAA rules, including Section 25.227.

Based upon the representations made to SES by AC BidCo concerning how it will operate on AMC-6 according to its letter dated March 14, 2017:

- SES certifies that it has completed coordination as required under the FCC's rules and that the power density levels specified by AC BidCo 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-6.
- If the FCC authorizes the operations proposed by AC BidCo, SES will include the power density levels specified by AC BidCo in all future satellite network coordination with other operators of satellites adjacent to AMC-6.

Yours Sincerely,



Kimberly M. Baum