

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 60 days commencing no later than May 15, 2017, to permit up to 100 AeroSat model HR6400 ESAA terminals to communicate in the conventional Ku-band with the U.S.-licensed AMC-9 satellite at 83° W.L.

Grant of the requested STA will serve the public interest by allowing AC BidCo to meet customer demand in U.S. airspace and ensure service quality by supplementing capacity currently being provided by the AMC-21 satellite. AC BidCo is preparing a modification application to add AMC-9 as an authorized point of communications, and seeks STA pending submission of and action on that application.

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. In order to enhance and expand its ESAA operations, AC BidCo is seeking authority to add AMC-9 as a point of communication.

STA Request

AC BidCo seeks STA to permit its AeroSat ESAA terminals to commence communications with AMC-9 pending submission of and action on its upcoming application to add AMC-9 to the AC BidCo ESAA License. Because AMC-9 is a U.S.-licensed satellite, full technical data regarding the satellite is already on file with the Commission,² and AC BidCo incorporates that information by reference herein. AC BidCo is also attaching a letter confirming that the proposed operations of the AeroSat terminals with AMC-9 are consistent with SES’s coordination agreements with operators of the satellites within six degrees on either

¹ See Call Sign E120106, File Nos. SES-MFS-20170109-00015 & SES-AFS-20170208-00139, granted in part and deferred in part Apr. 12, 2017 (the “AC BidCo ESAA License”).

² *SES Americom, Inc.*, Call Sign S2434, File No. SAT-MOD-20110621-00115, granted Aug. 25, 2011 (the “AMC-9 Grant”).

side of AMC-9. The technical parameters of AC BidCo's proposed operations with AMC-9 are consistent with those specified in the AC BidCo ESAA License.³

AC BidCo seeks authority to use AMC-9 capacity for ESAA operations on a primary basis in the 14-14.5 GHz uplink spectrum and the 11.7-12.2 GHz downlink spectrum, consistent with the AMC-9 License and the Commission's orders in the ESAA proceeding.⁴ Communications with the satellite will be supported by a teleport in Woodbine, MD, Call Sign E920698.

AMC-9 will primarily be used for coverage of the contiguous United States. AC BidCo requires access to this satellite to supplement capacity currently being provided on AMC-21 and ensure high quality service to travelers in U.S. airspace.

AC BidCo emphasizes that the scope of this STA request is limited. AC BidCo is only seeking authority to add AMC-9 as an authorized point of communication for a limited number of AeroSat 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-9 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. 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 supplement its existing capacity in response to customer demand on important air transport routes in U.S. airspace, promoting competition in the provision of aeronautical services and expanding the availability of in-flight broadband to air travelers and crew members.

³ Operations of the AeroSat ESAA terminals with AMC-9 will not involve any increase in the maximum off-axis EIRP density levels previously described to the Commission for those terminals.

⁴ *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).

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

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

5 May 2017

Subject: Engineering Certification of SES Americom, Inc. for the AMC-9 Satellite

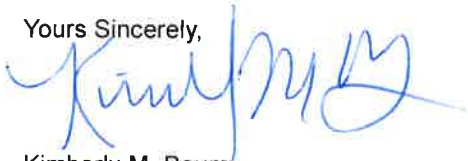
To whom it may concern,

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-9 satellite at 83° 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-9 according to its letter dated May 5, 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-9.
- 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-9.

Yours Sincerely,



Kimberly M. Baum