

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 @ 72W & SES-10 @ 67W [SAA & GSAA] (May 2017)

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.	<b>E-Mail:</b>	smcLellan@gemedia.com
<b>City:</b>	4553 Glencoe Avenue, Suite 300 Marina Del Rey	<b>State:</b>	CA
<b>Country:</b>	USA	<b>Zipcode:</b>	90292
<b>Attention:</b>	Mr Simon McLellan		



File # SYS-STA-20170522-00579  
 Call Sign E080100 Grant Date SAS-17  
 (or other identifier)  
 Term Dates From: 6-1-17 To: 7-31-17  
 Approved: Mark E. [Signature]

Applicant: Row 44, Inc.  
Call Sign: E080100  
File No.: SES-STA-20170522-00579  
Special Temporary Authority (STA)



File # SES-STA-20170522-00579  
Call Sign E080100 Grant Date 5-25-17  
(or other identifier)  
Term Dates  
From: 6-1-17 To: 7-31-17  
Approved: Paul E. Black

Row 44, Inc., is granted a 60-day STA, beginning June 1, 2017, to operate the TECOM 0.62m and QEST 0.63 m earth station aboard aircraft (ESAA) terminals to communicate with the AMC-3 satellite (Call Sign S2162) at the 72° W. L. orbital location and SES-10 satellite (S2950) at the 66.9° W. L. 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 and non-protected basis only.
2. Operations shall not exceed the proposed parameters in the underlying application FCC IBFS File number SES-MFS-20170221-00188 and shall not exceed the power as coordinated with the proposed satellites.
3. Operations of all ESAAs shall not exceed a total of 1,000 units.
4. In the event that there is a report of interference, Row 44 Inc.'s must immediately terminate transmissions and notify the FCC in writing.
5. 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.
6. 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.
7. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending application FCC IBFS file number SES-MFS-20170221-00188 as amended by SES-AMD-20170414-00395.
8. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.P.R. § 0.261, and is effective immediately.

<b>2. Contact</b>	
<b>Name:</b>	David S. Keir
<b>Company:</b>	Lerman Senter PLLC
<b>Street:</b>	2001 L Street, NW Suite 400
<b>City:</b>	Washington
<b>Country:</b>	USA
<b>Attention:</b>	
<b>Phone Number:</b>	202-429-8970
<b>Fax Number:</b>	202-293-7783
<b>E-Mail:</b>	dkeir@lermansenter.com
<b>State:</b>	DC
<b>Zipcode:</b>	20036 -4946
<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	
06/01/2017	
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: Exhibit      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.) Request for special temporary authority for a period of sixty (60) days commencing June 1, 2017 to operate using space segment capacity on both AMC-3 at 72WL and SES-10 at 67 WL prior to action on Row 44's pending modification application, which seeks to change its license to specify use of these satellites and to operate with an additional antenna. See	
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.**

## **12. Description**

Request for special temporary authority for a period of sixty (60) days commencing June 1, 2017 to operate using space segment capacity on both AMC-3 at 72WL and SES-10 at 67 WL prior to action on Row 44's pending modification application, which seeks to change its license to specify use of these satellites and to operate with an additional antenna. See Attached Narrative.

### 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 Earth Stations Aboard Aircraft ("ESAA") network (Call Sign E080100) using additional points of communication and a new, next generation antenna. In particular, Row 44 seeks to use space segment capacity on two SES, S.A. ("SES") satellites, AMC-3 at 72° W.L. ("AMC-3") and SES-10 at 67° W.L. ("SES-10"), using both its currently licensed Ku-band antenna and the TECOM/QEST GSAA antenna that is subject of its pending license modification application. *See* FCC File No. SES-MFS-20170221-00188 (originally filed as SES-MFS-20170126-00061), as amended by SES-AMD-20170414-00395.

Row 44 is currently authorized under an existing STA to transmit to AMC-3 at the 72° W.L. orbital location using the licensed antenna (originally granted in FCC File No. SES-STA-20161223-00972 and most recently extended on May 8, 2017 in FCC File No. SES-STA-20170503-00495). By this request it seeks additional authority to use, on a limited basis, the newer GSAA antenna and to make use of SES-10, which is replacing AMC-3's prior operation at 67° W.L., pending final action on the modification application.

STA is sought for all antennas currently authorized and operating under Row 44's existing FCC license. Although a total of 1,000 Ku-Stream antennas are authorized under this license, only about 650 are installed on aircraft operating in U.S. airspace, and only a portion of this total are operating concurrently at any one time. For the newer GSAA antenna that Row 44 seeks to add to the license permanently via the pending modification application, Row 44 seeks initial authority to operate up to twenty (20) mobile units during the sixty (60) day period beginning on June 1, 2017.

Row 44's operations on both AMC-3 at 72° W.L. and SES-10 at 67° W.L. will not cause harmful interference to any adjacent satellites operating consistent with FCC's two-degree spacing policy. Attached are coordination certification letters from SES, in accordance with Sections 25.227(b)(2) of the Commission's Rules, that cover these proposed operations, which will also be consistent with its existing, long-term coordination agreements with the National Science Foundation and the National Aeronautics and Space Administration pursuant to which the existing ESAA license was granted.

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 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 has filed an application to modify its license permanently to permit access to AMC-3 at its new 72° W.L. orbital location and recently

amended that pending application to add SES-10 at 67° W.L. as a point of communication as well (*see* FCC File No. SES-AMD-20170414-00395).

Grant of the authority requested here will promote the public interest by permitting Row 44 to provide ongoing service to its customers using capacity on both requested satellites. Continued use of AMC-3 at 72° W.L. will maintain effective coverage of all U.S. domestic routes currently served by Row 44. Additional use of SES-10 will allow Row 44 to serve customers that previously received service using AMC-3 and AMC-6 at the 67° W.L. orbital location. 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 updated authority as of June 1, 2017, for a period of sixty (60) days, to use the AMC-3 and SES-10 satellites as points of communication in the conventional Ku-band using both the TECOM antennas now operating under its FCC ESAA network license as well as additional, improved antennas for which full authority is sought in its pending modification application.





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

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

13 January 2017

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

To whom it may concern,

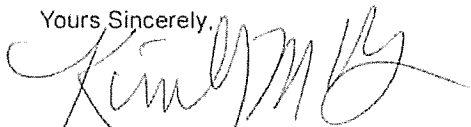
This letter confirms that SES is aware that Global Eagle Entertainment, Inc. ("GEE"), licensed by the Federal Communications Commission ("FCC") as Row 44, Inc., has filed an application seeking special temporary authority ("STA") in connection with its blanket authorization from the FCC to operate Ku-band Earth Stations Aboard Aircraft ("ESAA") transmit/receive terminals (Call Sign E080100) pursuant to ITU RR 5.504A and Section 25.227 of the Commission's rules, on domestic and international flights. The STA request seeks authority for GEE's ESAA terminals to communicate with the AMC-3 satellite at 72° W.L., under the current ESAA rules, including Section 25.227.

Based upon the contents of the STA request and the representations made to SES by GEE for its TECOM SAA Antenna concerning how it will operate on AMC-3 according to its letter dated January 13, 2017:

- 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.

Please let us know if additional information is required.

Yours Sincerely,



Kimberly M. Baum



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

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

13 January 2017

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., has filed an application seeking special temporary authority ("STA") in connection with its blanket authorization from the FCC to operate Ku-band Earth Stations Aboard Aircraft ("ESAA") transmit/receive terminals (Call Sign E080100) pursuant to ITU RR 5.504A and Section 25.227 of the Commission's rules, on domestic and international flights. The STA request seeks authority for GEE's ESAA terminals to communicate with the AMC-3 satellite at 72° W.L., under the current ESAA rules, including Section 25.227.

Based upon the contents of the STA request and the representations made to SES by GEE for its QEST GSAA Antenna concerning how it will operate on AMC-3 according to its letter dated January 13, 2017:

- 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.

Please let us know if additional information is required.

Yours Sincerely,

Kimberly M. Baum

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Kimberly M. Baum  
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11 April 2017

Subject: Engineering Certification of SES Americom, Inc. for the SES-10 Satellite

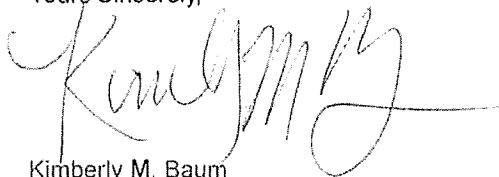
To whom it may concern,

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 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 E080100). The Modification Application will seek authority for GEE's ESAA terminals to communicate with the SES-10 satellite at 67° W.L., under the current ESAA rules, including Section 25.227.

Based upon the representations made to SES by GEE concerning how it will operate on SES-10 according to its letter dated April 11, 2017:

- 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 SES-10.
- 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 SES-10.

Yours Sincerely,



Kimberly M. Baum

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