

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 immediate special temporary authority (“STA”) for a period of 60 days to permit up to 100 AeroSat model HR6400 ESAA terminals and up to 100 ThinKom model 2Ku ESAA terminals to communicate in conventional and extended Ku-band frequencies with the U.S.-licensed AMC-6 satellite at 83° W.L.

Grant of the requested STA will serve the public interest by allowing AC BidCo to restore capacity that it had been using on the AMC-9 satellite, which recently experienced an anomaly and is not currently capable of providing service. AC BidCo is preparing a modification application to add AMC-6 at 83° W.L. 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. AC BidCo is seeking authority to add AMC-6 at 83° W.L. as a point of communication to replace capacity it had been using on the AMC-9 satellite.

STA Request

AC BidCo seeks STA to permit its ESAA terminals to commence communications with AMC-6 pending submission of and action on its upcoming application to add AMC-6 at 83° W.L. to the AC BidCo ESAA License. Following the AMC-9 anomaly, AC BidCo received an STA to use AMC-6 at its current location of 85° W.L. for ESAA traffic that had been carried by AMC-9.² In order to provide a longer-term solution to restore service at 83° W.L., SES has indicated that it plans to relocate AMC-6 from 85° W.L. to 83° W.L.³

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 AC BidCo LLC, File No. SES-STA-20170619-00660 (“AC BidCo AMC-6 STA Request”), granted June 20, 2017 (“AC BidCo AMC-6 STA”).

³ SES Americom, Inc., File No. SAT-STA-20170623-00096 (the “AMC-6 STA Request”), granted June 29, 2017. SES has requested authority to use its AMC-4 satellite, which recently

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Under the proposed schedule described by SES, AMC-6 is expected to arrive at 83° W.L. on or about July 3, 2017.⁴ AC BidCo requests STA to permit it to begin using AMC-6 as soon as it arrives. As discussed above, the Commission has authorized AC BidCo's use of AMC-6 at 85° W.L. pursuant to the AC BidCo AMC-6 STA. The two-degree relocation of AMC-6 from 85° W.L. to 83° W.L. will not result in any material changes to the AC BidCo operations using the satellite.

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 previously received Commission authority to use AMC-6 conventional Ku-band capacity at the satellite's 67° W.L. orbital location,⁶ and now proposes to operate with the satellite at 83° W.L. in both the conventional and extended Ku-band frequencies. The technical parameters of AC BidCo's proposed operations with AMC-6 at 83° W.L. are consistent with those specified in the AC BidCo ESAA License.⁷

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 the 11.7-12.2 GHz downlink spectrum and on an unprotected basis in the 11.45-11.7 GHz downlink spectrum, consistent with the AMC-6 License and the Commission's orders in the ESAA proceeding.⁸ Communications with the satellite will

began drifting from 67° W.L. to 134.9° W.L., as a bridge satellite to carry traffic currently on AMC-6 during the planned relocation of AMC-6. SES Americom, Inc., File No. SAT-STA-20170623-00094.

⁴ AMC-6 STA Request, Narrative at 2-3.

⁵ *SES Americom, Inc.*, Call Sign S2347, File No. SAT-MOD-20170316-00051, granted June 14, 2017 (the "AMC-6 License").

⁶ The AC BidCo ESAA License authorizes the ThinKom AES2 antennas to communicate with AMC-6 at 67° W.L., and AC BidCo requested and received special temporary authority to permit AeroSat AES1 antennas to communicate with AMC-6 at that location. *See* Call Sign E120106, File Nos. SES-STA-20170321-00321, granted Mar. 28, 2017, & SES-STA-20170421-00455, granted Apr. 26, 2017.

⁷ Operations of the AC BidCo ESAA terminals with AMC-6 will not involve any increase in the maximum off-axis EIRP density levels previously described to the Commission.

⁸ *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).

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be supported by a teleport in Woodbine, MD, Call Sign E140054. A letter confirming that the proposed ESAA operations with AMC-6 at 83° W.L. are consistent with coordination agreements with operators of the satellites within six degrees on either side of that location is attached. AMC-6 will provide coverage of North America. AC BidCo requires immediate access to this satellite to restore service that was interrupted when AMC-9 unexpectedly ceased operations.

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 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 STA on less than three business days' notice is justified under the facts here. Section 25.120(a) specifies that an STA request received less than three working days in advance can be accepted "upon due showing of extraordinary reasons" why the request could not have been filed earlier. In this case, the anomaly affecting AMC-9 occurred suddenly and without warning, and SES only recently developed its plan for restoring service at 83° W.L. As a result, AC BidCo was unable to anticipate the need for replacement capacity and submit this request with more advance notice.

Grant of the proposed STA will allow AC BidCo to restore capacity needed to satisfy customer demand on important North American air transport routes, including 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.

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

29 June 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 E140054). The Modification Application will seek authority for AC BidCo's ESAA terminals to communicate with the AMC-6 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-6 according to its letter dated June 29, 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,

Philippe Secher
Senior Manager
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