

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 as soon as possible but no later than August 4, 2017, to permit up to 200 ThinKom model 2Ku ESAA terminals to communicate in the conventional Ku-band with the U.S.-licensed AMC-4 satellite at 134.9° 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 and the Pacific Ocean, including in U.S. airspace. AC BidCo has submitted a modification application amendment to add satellites including AMC-4 as authorized points of communications for its ESAA network,² and seeks STA pending action on that application.

Background

AC BidCo is currently 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-4 as a point of communication for its ESAA network.

STA Request

Pending action on the AC BidCo Modification, AC BidCo seeks STA to permit its ThinKom ESAA terminals to commence communications with AMC-4 to meet customer demand. The AC BidCo Modification contains complete information regarding AC BidCo’s proposed operations with this spacecraft, and AC BidCo incorporates that information by reference herein. The modification also includes a letter confirming that AC BidCo’s proposed operations of the ThinKom ESAA terminals are consistent with coordination agreements with operators of the satellites within six degrees on either side of 134.9° W.L., and a copy of the letter is attached hereto for the Commission’s convenience.

¹ See Call Sign E120106, File No. SES-MFS-20170109-00015, granted July 21, 2017 (the “AC BidCo ESAA License”).

² See Call Sign E120106, File No. SES-MFS-20170725-00793 (the “AC BidCo Modification”).

AMC-4 is U.S.-licensed, and a request to reassign the satellite from 67° W.L. to 134.9° W.L. is currently pending before the Commission.³ The technical parameters of the proposed operations with AMC-4 are consistent with those specified in the AC BidCo ESAA License.⁴

AC BidCo seeks STA to use AMC-4 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 satellite's license as modified pursuant to the AMC-4 Relocation Application and with the Commission's orders in the ESAA proceeding.⁵ Communications with the satellite will be supported by a teleport in Woodbine, MD.⁶

AMC-4 will provide coverage of North America and the Pacific Ocean. AC BidCo requires access to this capacity to ensure that it has sufficient bandwidth to meet near-term customer demand for in-flight connectivity.

AC BidCo emphasizes that the scope of this STA request is limited. AC BidCo is only seeking authority to add AMC-4 as an authorized point of communication for a limited number of ThinKom 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.

³ *SES Americom, Inc.*, Call Sign S2135, File No. SAT-MOD-20170518-00073, ("AMC-4 Relocation Application"). Pending action on the AMC-4 Relocation Application, the Commission has authorized the drift of AMC-4 to 134.9° W.L., *see SES Americom, Inc.*, Call Sign S2135, File No. SAT-STA-20170503-00070, granted June 7, 2017, and SES has requested special temporary authority for AMC-4 operations upon the satellite's arrival, *see SES Americom, Inc.*, Call Sign S2135, File No. SAT-STA-20170725-00108.

⁴ Operations of the ThinKom ESAA terminals with AMC-4 will not involve any increase in the maximum off-axis EIRP density levels previously described to the Commission for those terminals.

⁵ *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) (collectively, the "ESAA Orders").

⁶ SES has applied for a license for the new Woodbine antenna, and a call sign has not yet been assigned to the application. *See SES Americom, Inc.*, Submission ID IB2017002019. Pending action on the license application, SES is seeking an STA to use the antenna to communicate with AMC-4 at 134.9° W.L. *See SES Americom, Inc.*, Submission ID IB2017002022.

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-4 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 the proposed STA will allow AC BidCo to respond to urgent customer demand for increased capacity on important air transport routes over North America and the Pacific Ocean, promoting competition in the provision of aeronautical services and expanding the availability of in-flight broadband to air travelers and crew members.

AC BidCo understands that any Commission grant of this STA will be without prejudice to the ultimate determination the Commission will make regarding the AC BidCo Modification. In addition, AC BidCo acknowledges that any action taken pursuant to a grant of the requested STA will be at AC BidCo's own risk.



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

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

July 25, 2017

Subject: Engineering Certification of SES Americom, Inc. for the AMC-4 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 ThinKom ESAA terminals to communicate with the AMC-4 satellite at 134.9° 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-4 according to its letter dated July 25, 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-4.
- 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-4.

Yours Sincerely,

A handwritten signature in blue ink that reads "Kimberly M. Baum".

Kimberly M. Baum

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