ATTACHMENT

Description of Application for Modification of License

1.0 OVERVIEW

Row 44, Inc. ("Row 44") seeks modification of its Ku-band Earth Stations Aboard Aircraft ("ESAA") license (Call Sign E080100) for the purpose of adding Telstar 12 at 109.2° W.L. ("T12") as an additional point of communication. Row 44 seeks this modification subject to all terms and conditions set forth in its current license[1] and the operations proposed are otherwise consistent with the technical specifications set forth in its current license. Operations using T12 would use both the TECOM Ku-Stream (SAA/Remote 2) and QEST Q050000 (GSAA/Remote 3) antennas. The Schedule B reflects only the additional point of communication, and does not recapitulate the technical data contained in its current license.

2.0 ADDITIONAL POINT OF COMMUNICATION REQUESTED

T12 is a U.S.-licensed satellite under Call Sign S2462 (FCC File No. SAT-MOD-20160513-00050), licensed to Skynet Satellite Corporation, a U.S. subsidiary of Telesat Canada. It is currently operating pursuant to a Canadian ITU registration at the 109.2° W.L. orbital location. The addition to the Row 44 license of authority to communicate using T12 will provide additional near term space segment capacity for Row 44's ESAA network, thereby allowing it to provide improved coverage for the provision of its in-flight Wi-Fi connectivity services to airline passengers on flights operating over North America, the Gulf of Mexico and parts of the Caribbean Sea. Row 44 is concurrently seeking special temporary authority ("STA") to permit it to commence service immediately using its SAA antenna (Remote #2) for communication via T12.

3.0 COORDINATION CERTIFICATION [47 C.F.R. § 25.227(b)(2)]

Row 44's intended operations are within the scope that Telesat has coordinated with the adjacent satellite operators, and should not cause harmful interference into adjacent satellites operating in accordance with FCC's two-degree spacing policy. Exhibit A attached hereto is a copy of the September 21, 2017 coordination certification letter covering Row 44's proposed operations using T12.

In the event that a Ku-band NGSO FSS system is launched in the future, Row 44 would enter into coordination with the NGSO FSS system operator to establish operating parameters that permit successful co-frequency sharing, and would modify its operations as necessary to effect any coordination agreement reached. Row 44 acknowledges that the Commission may condition the grant of any modified license issued to it upon a requirement that it complete such coordination at the appropriate time.

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[1] *See* Row 44 Inc., Call Sign E080100, FCC File No. SES-MFS-20170221-00188 (Sat. Div., granted July 20, 2017).

4.0 TECHNICAL DATA, LINK BUDGETS AND PREDICTED COVERAGE AREAS [47 C.F.R. § 25.227(b)(4)]

Exhibit B attached hereto includes representative link budgets and a depiction of the geographic coverage contours for operations using T12 at 109.2° W.L.

5.0 REVISED SPACECRAFT, FREQUENCY & BEAM COVERAGE

[See Next Page]

Table 1: Spacecraft, Frequency & Beam Coverage Table
(All Provide Some Coverage to U.S. Locations)

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Satellite Operator
AMC-1	129.15 W	North America, Central America and Pacific	14.05-14.47	11.7-12.2	**SES**
AMC-2	84.85 W	North America, Caribbean and North Atlantic	14.05-14.47	11.7-12.2	
AMC-3	72.0 W	North America, Central America, Atlantic and Caribbean	14.05-14.47	11.7-12.2	
AMC-9	83.0 W	North America, Caribbean, Central America and North Atlantic	14.05-14.47	11.7-12.2	
SES-1	101.0 W	North America, Central America, Pacific and Caribbean	14.05-14.47	11.7–12.2	
SES-10	67.0W	North America, Central America, South Atlantic and Caribbean	14.05-14.47	11/7-12.2	
IS-29E	50.0 W	North America, Central America, South America, North Atlantic and Caribbean	14.05-14.47	10.95-11.2, 11.2-11.45, 11.45-11.7, 11.7-12.2, 12.2-12.5	**Intelsat**
Eutelsat 115WB*	114.9 W	North America, North Atlantic and Pacific Ocean	14.05-14.47	11.7-12.2	**Eutelsat**
Telstar 12	109.2 W	North America, Gulf of Mexico and Caribbean	14.05-14.47	11.7-12.2	**Telesat (Skynet)**

* = Non-U.S.-licensed satellites included on Ku-band Permitted List

7.0 TELEPORT UPLINK LOCATIONS

Table 2
Teleport Locations for Provision of Service within the United States

Satellite	Orbital Location	Teleport Location(s)	Site Operator	Call Sign(s)
AMC-1	129.15 W	Holmdel, NJ	GEE/MTN	E160163
AMC-2	80.85W	N. Las Vegas, NV	Hughes	E940460
AMC-3	72.0 W	Holmdel, NJ	GEE/MTN	E160163
AMC-9	83.0W	North Las Vegas, NV	Hughes	E940460
SES-1	101.0W	North Las Vegas, NV	Hughes	E940460
SES-10	67.0W	Steele Valley, CA	Level 3/ Vyvx	E950202
IS-29E	50.0 W	Holmdel, NJ	GEE/MTN	E160163
Eutelsat 115WB*	114.9W	Southfield (Detroit), MI	Hughes	E990170
Telstar 12	109.2W	South Jordan, UT	LBiSat LLC	E030342

* = Non-U.S.-licensed satellites included on Ku-band Permitted List

7.0 LICENSEE CERTIFICATION

I, Simon McLellan, Chief Engineer of Row 44, Inc. ("Row 44") and Global Eagle Entertainment, Inc. ("Global Eagle"), hereby certify that Row 44/Global Eagle will continue to comply with the requirements of paragraphs (a)(6), (a)(9), (a)(10), and (a)(11) of Section 25.227 of the Commission's Rules and the conditions of its existing license.

s/ Simon McLellan
Simon McLellan
Chief Engineer
Row 44, Inc., a subsidiary of
Global Eagle Entertainment, Inc.

October 1, 2017