


APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
STA for Telstar 12 @ 109.2WL (Oct. 2017)

1. Applicant

Name:	Row 44 Inc.	Phone Number:	310-437-6000
DBA Name:		Fax Number:	
Street:	c/o Global Eagle Entertainment Inc.	E-Mail:	smcLellan@geemedia.com
City:	4553 Glencoe Avenue, Suite 300 Marina Del Rey	State:	CA
Country:	USA	Zipcode:	90292
Attention:	Mr Simon McLellan		



GRANTED
International Bureau

File # SES-STA-2017-1002-01093
Call Sign E080100 Grant Date 10-6-17
(or other identifier)
Term Dates 10-6-17 to 11-8-17
Approved: [Signature]

Applicant: Row 44, Inc.
Call Sign: E080100
File No.: SES-STA-20171002-01093
Special Temporary Authority (STA)



File # SES-STA-20171002-01093
E080100
Call Sign E080100 Grant Date 10-6-17
(or other identifier)
Term Dates
From: 10-6-17 To: 11-5-17
Approved: Paul E. Hieb

Row 44, Inc., is granted a 30-day STA to operate the TECOM 0.62m model Ku-Stream and QEST 0.63 m model Q50000 earth station aboard aircraft (ESAA) terminals to communicate with the Telstar 12 satellite (Call Sign S2462) at the 109.2° W. L. orbital location in the 14.05-14.47 GHz (Earth-to-space) and 10.95-11.2 GHz, 11.45-12.2 GHz (space-to-Earth) frequency bands in addition to the currently authorized points of communication as specified by authorization FCC IBFS file number SES-MFS-20170221-00188 and under the following conditions:

1. Operations under this authority are on a non-interference basis only and non-protected basis only and while operating under this temporary authority, Row 44 must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating radio-communications systems. Row 44 must cease operations immediately upon notification of such interference and must immediately inform the Commission, in writing, of such an event.
2. Operation pursuant to this authorization must be in compliance with the terms of the licensee's coordination agreements with the National Science Foundation and the National Aeronautics and Space Administration pertaining to operation of aircraft earth stations in the Ku-Band.
3. Operations of terminals shall not be within line-of-sight of TDRSS stations.
4. Operations will be over North America region, the Gulf of Mexico, and parts of the Caribbean Sea.
5. Operations will exclude frequencies 11.2-11.45 GHz and 12.25-12.75 GHz (space-to-Earth) with respect to Telstar 12.
6. Operations is subject to all terms and conditions set forth in its currently authorized FCC IBFS file number SES-MFS-20110221-00188.
7. Operations in the bands 10.95-11.2 GHz and 11.45-11.7 GHz (Space-to-Earth) by the fixed-satellite service in the geostationary satellite orbit shall be limited to international systems, i.e. other than domestic systems. (NG52)
8. Operations shall not exceed the proposed parameters in the underlying application FCC IBFS File number SES-MOD-20171002-01094 for blanket authorization and shall not exceed the power as coordinated with Telstar 12 satellite.
9. 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.

10. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending application FCC IBFS file number SES-MOD-20171002-01094.

11. 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.

2. Contact

Name: David S. Keir **Phone Number:** 202-429-8970
Company: Lerman Senter PLLC **Fax Number:** 202-293-7783
Street: 2001 L Street, NW **E-Mail:** dkeir@lermansenter.com
Suite 400
City: Washington **State:** DC
Country: USA **Zipcode:** 20036 -4946
Attention: **Relationship:** 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 IB2017002776

4a. Is a fee submitted with this application?

If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

Governmental Entity Noncommercial educational licensee

Other (please explain):

4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station

5. Type Request

Use Prior to Grant Change Station Location Other

6. Requested Use Prior Date
10/04/2017

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 A 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.) <div style="border: 1px solid black; padding: 5px;">Request for special temporary authority for an initial period of sixty (60) days commencing October 4, 2017 to operate up to 110 SAA antennas using space segment capacity on Telstar 12 at 109.2 W.L. prior to action on Row 44's pending application to modify its license to specify use of T12 under its ESAA license. See Attached Explanatory Statement.</div>	
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"; 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).	

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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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.

2. Contact	
Name: David S. Keir	Phone Number: 202-429-8970
Company: Lerman Senter PLLC	Fax Number: 202-293-7783
Street: 2001 L Street, NW Suite 400	E-Mail: dkeir@lermansenter.com
City: Washington	State: DC
Country: USA	Zipcode: 20036 -4946
Attention:	Relationship: 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 IB2017002776	
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 10/04/2017	
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 A Attachment 3:
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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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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 license¹ 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.

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



1601 Telesat Court
Ottawa, ON, Canada K1B 5P4

21 September 2017

Federal Communications Commission
International Bureau
445 12th Street SW, Washington, DC 20554

Re: Engineering Certification of Telesat

To Whom It May Concern:

This letter certifies that Telesat is aware that Global Eagle Entertainment Inc. ("Global Eagle"), 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 Ku-band earth stations aboard aircraft ("ESAA") pursuant to the ITU Radio Regulations Article 5.504A and Section 25.227 of the FCC rules (Call Sign E080100). The Modification Application will seek authority for Global Eagle's ESAA terminals to communicate with Telstar 12 ("T12") satellite at 109.2°W.L. under the current ESAA rules, including Section 25.227.

Based on the information provided by Global Eagle, Telesat understands the technical characteristics associated with the operation of the Global Eagle's ESAA terminals and:

- Telesat certifies that it has completed frequency coordination as required under the FCC rules and that the operation of Global Eagle's ESAA terminals at the power density levels provided to Telesat is consistent with the existing coordination agreements with all adjacent satellite operators within +/- 6 degrees of orbital separation from T12 at 109.2°W.L.;
- If the FCC authorizes the operations proposed by Global Eagle, Telesat will take into consideration the power density levels associated with such operations in all future satellite network coordination with adjacent satellite operators.

Sincerely Yours,

A handwritten signature in black ink, appearing to be "Bahram Borina", written over a circular scribble.

BAHRAM BORNA
Senior Systems Engineer
Telesat