

APPLICATION FOR SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 25.120 of the Commission's rules, the Boeing Company ("Boeing") requests special temporary authority ("STA") to permit communications between its licensed Earth Stations Aboard Aircraft ("ESAA")¹ terminals and Eutelsat E172B (E172B) as authorized points of communication.²

The Boeing Broadband Satellite Network ("BBSN") currently operates with multiple satellite points of communications, including satellite E172A at orbital location 172° E.L. The E172A satellite is scheduled to be replaced during the 4th quarter of 2017. Boeing has identified the E172B satellite as a suitable replacement to support Boeing's operations on behalf of the United States Government. Boeing has therefore applied to modify its ESAA license to begin operating using the E172B satellite.³ This STA request is filed to permit testing to begin with the new satellite during the pendency of the modification application. Boeing requests that this approval be provided by November 15, 2017 and extend for a period of sixty days.

¹ Application of The Boeing Company for Authority to Operate Up to 100 Earth Stations Aboard Aircraft, Call Sign E140097, File Not. SES-LIC-20140922-00748 (Granted Mar. 18, 2015) ("Boeing ESAA Application").

² E172B Call Sign S3021.

³ Application of The Boeing Company, File No. SES-MOD-20171003-01092 (Filed October 3, 2017).

I. SATELLITE POINTS OF COMMUNICATION AND NETWORK CONTROL

ES 172 LLC currently has an application pending at the commission to replace the E172A satellite. Thus, all of the information normally required under Section 25.114, 47 C.F.R. § 25.114, has already been provided to, and approved by, the Commission in prior applications. To the extent necessary, Boeing incorporates that information by reference.⁴

The Boeing ESAA network uses variable power-density control of individual simultaneously transmitting co-frequency ESAA terminals in the same satellite receiving beam. Sections 25.227(a)(3)(ii) and 25.227(b)(3)(ii) of the Commission's rules require variable power systems to either operate 1 dB below the off-axis EIRP spectral density ("ESD") envelope defined in the Commission's rules, or to secure certificates from the target satellite operator indicating that such higher power levels have been coordinated with adjacent satellite operators within six degrees in each direction. Accordingly, Boeing provides the attached statement from Eutelsat certifying to the information required by the Commission's rules, including that the aggregate ESD limits that the Boeing ESAA system adheres to have been coordinated with adjacent satellite operators. The network control and measures for ensuring the protection of other spectrum users will be the same as described in Sections II.D and V of Boeing's ESAA application.⁵

⁴ Application of ES 172 LLC, SAT-RPL-20170927-00136 (Filed 27 September 2017) ⁵ Boeing 5
⁵ ESAA Application at 7, 15.

II. PUBLIC INTEREST

Boeing's BBSN network exclusively serves the needs of the United States Air Force Air Mobility Command in support of critically-important air transport operations. BBSN is used by the Air Force to enable broadband capabilities on more than a dozen Very Important Personnel/Special Air Mission aircraft operated by the U.S. Air Force to transport senior leadership of the U.S. Government and the Department of Defense.

It is crucial that BBSN add this additional coverage and capacity as the capabilities required by Air Force Mobility Command has change. Boeing will need to do extensive testing of the BBSN system with these new satellites prior to an operational cutover. Therefore, extraordinary circumstances exist requiring this temporary authority and a delay in the institution of these temporary test operations would seriously prejudice the public interest.⁶

⁶ See 47 C.F.R. § 25.120(b)(1).

ATTACHMENT 1

Satellite Operator Coordination Letters

September 1st, 2017

To whom it may concern

Re: Engineering Certification of Eutelsat

Eutelsat confirms and hereby certifies the following with respect to the operations proposed in the above reference application:

- a) The proposed Ku-band operation of BOEING's ESAA terminal has the potential to create harmful interference to adjacent satellite networks that may be unacceptable;
- b) BOEING will use Eutelsat capacity on the Eutelsat 10A and Eutelsat 172B satellites for other ESAA operations
- c) The proposed operation of the ESAA transmit/receive terminals at the power density levels defined between BOEING and Eutelsat is consistent with existing satellite coordination agreements with the adjacent satellites of the Eutelsat 10A and Eutelsat 172B satellites within 6 degrees of orbital separation from the satellite.

If the FCC authorizes the operation proposed by BOEING, Eutelsat will include the power density levels specified by BOEING, defined within the satellite coordination agreements, in all future satellite network coordination with operators of satellite that are adjacent to those satellites addressed by this letter.

Sincerely,



For Eutelsat
Filipe De Oliveira
Director of Resources Engineering