

EXPLANATORY STATEMENT

Row 44, Inc., pursuant to Section 25.120(b) of the FCC's Rules, hereby requests Special Temporary Authority ("STA") for an additional period of sixty (60) days to operate its licensed Ku-band Earth Stations Aboard Aircraft ("ESAA") network (Call Sign E080100) using the Telstar 12 satellite at 109.2° W.L. ("T12") as an additional point of communication for up to one hundred ten (110) of its 1,000 authorized TECOM/QEST SAA antennas (Remote #2). Row 44's current authority for these operations will expire at 11:59pm on November 5, 2017.¹

Row 44's operations on T12 will not cause harmful interference to any adjacent satellites operating consistent with FCC's two-degree spacing policy. Row 44's September 21, 2017 coordination certification letter from Telesat Canada covering the proposed operations, in accordance with Sections 25.227(b)(2) of the Commission's Rules, was included in its initial STA request (FCC File No. SES-STA-20171002-01093), and is incorporated here by reference. The operations are also consistent with Row 44's coordination agreements with the National Science Foundation and the National Aeronautics and Space Administration pursuant to which the existing ESAA license and STA were granted.

Under Section 25.120(b)(1) of the FCC's Rules, the International Bureau may grant an STA when the public interest supports the relief requested, and/or delay in the institution of temporary operations would be contrary to the public interest. *See* 47 C.F.R. § 25.120(b)(1). Such authority may be granted for a period not to exceed 60 days where the applicant has filed a request for permanent authority for the parameters and facilities requested. *See* 47 C.F.R. § 25.120(b)(3). This is the case here, where Row 44 has pending an application to modify its license permanently to permit access to T12.

Grant of the authority requested here will promote the public interest by permitting Row 44 to continue providing service to its customers using available capacity on T12. Grant of the requested STA is consistent with Commission policy and will not adversely affect other authorized operations. Indeed, Row 44 has already been operating as requested under the initial STA for almost 30 days.

Row 44 acknowledges that any action taken pursuant to a grant of the requested STA will be at its own risk, and respectfully requests that the FCC grant it additional authority as of midnight on November 6, 2017, for an additional period of sixty (60) days to and including January 5, 2018, to use the T12 satellite as a point of communication in the conventional Ku-band using its TECOM antenna (Remote #2) authorized under its FCC ESAA network license.

¹ Although Row 44 requested the full sixty (60) day operating period permitted by the Commission's Rules in its initial STA request, it was granted only a 30-day STA. *See* 47 C.F.R. § 25.120(b)(3); FCC File No. SES-STA-20171002-01093. The Bureau did not provide any reason for the shorter-term grant, and Row 44 is aware of no reason why an operating period shorter than 60 days would be indicated. Accordingly, Row 44 requests an additional 60-day STA in order to provide greater certainty of final action on the underlying modification application in advance of expiration of the authority requested here.