

Row 44 Inc.

Approved by OMB
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

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



File # SES-STA-20171103-01233
 Call Sign E080100 Grant Date 11-8-17
 (or other identifier)
 Term Dates
 From: 11-8-17 To: 1-7-18
 Approved: *[Signature]*

Applicant: Row 44, Inc.
Call Sign: E080100
File No.: SES-STA-20171103-01233
Special Temporary Authority (STA)



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From: 11-8-17 To: 1-7-18
Approved: [Signature]

Row 44, Inc., is granted extension of STA for 60 days 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 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. Except as otherwise provided for herein, use of the bands 10.7-11.7 GHz (space-to-Earth) and 12.75-13.25 GHz (Earth-to-space) by geostationary satellites in the fixed-satellite service (FSS) shall be limited to international systems, i.e., other than domestic systems. In the sub-bands 10.95-11.2 GHz and 11.45-11.7 GHz, Earth Stations on Vessels (ESV), Vehicle-Mounted Earth Stations (VMES), and Earth Stations Aboard Aircraft (ESAA) as regulated under 47 CFR part 25 may be authorized for the reception of FSS emissions from geostationary satellites, subject to the condition that these earth stations shall not claim protection from transmissions of non-Federal stations in the fixed service. (NG52)
7. 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.
8. 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.

9. 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.

10. Continued operations during this extension was authorized pursuant to Section 1.62 of the Commission's rules, 47 C.F.R. § 1.62.

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 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 11/06/2017	
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: 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.) Request for special temporary authority for an additional period of sixty (60) days commencing November 6, 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 (File No. SES-MOD-20171002-01094).	
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"; 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).	

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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.

12. Description

Request for special temporary authority for an additional period of sixty (60) days commencing November 6, 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 (File No. SES-MOD-20171002-01094). See Attached Explanatory Statement.

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.