

EXPLANATORY STATEMENT

Row 44, Inc., pursuant to Section 25.120(b) of the FCC's Rules, hereby requests Special Temporary Authority ("STA") for an initial period of sixty (60) days to operate its licensed Ku-band Earth Stations Aboard Aircraft ("ESAA") network (Call Sign E080100) using the SES-15 satellite at 129° West Longitude as a replacement for AMC-1, previously at that location, to expand its operations at 129° W.L. to include the 10.7-11.7 GHz downlink bands in use on SES-15, and to add the use of the AMC-1 satellite at its new location at 130.9° West Longitude.

STA is sought to transmit to SES-15 and AMC-1 for an aggregate of up to one hundred ten (110) of its 1,000 authorized TECOM Ku-Stream (SAA/Remote 2) and QEST Q050000 (GSAA/Remote 3) antennas. Row 44's operations on these satellites will not cause harmful interference to any adjacent satellites operating consistent with FCC's two-degree spacing policy. Attached are coordination certification letters from SES for each satellite dated May 8, 2018, provided in accordance with Section 25.227(b)(2) of the Commission's Rules. The proposed operations will also be consistent with Row 44's existing, long-term coordination agreements with the National Science Foundation and the National Aeronautics and Space Administration pursuant to which the existing ESAA license was 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 is filing concurrently an application to modify its license permanently to permit access to both of the satellites requested.

Grant of the authority requested here will promote the public interest by permitting Row 44 to provide ongoing service to its customers using available capacity on SES-15 and relocated capacity on AMC-1, which it previously used at the 129° W.L. orbital location. Grant of the requested STA is consistent with Commission policy and will not adversely affect other authorized operations.

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 authority as of May 21, 2018, for a period of sixty (60) days, to use the SES-15 and AMC-1 satellites as points of communication in the conventional Ku-band, and in the 10.7-11.7 GHz downlink bands on SES-15, using its SAA and GSAA antennas (Remote #2 and Remote #3) authorized under its existing FCC ESAA network license.



Kimberly M. Baum
Vice President Spectrum Management & Development, Americas

**Federal Communications Commission
International Bureau
445 12th Street, S.W.
Washington, D.C. 20554**

8 May 2018

Subject: Engineering Certification of SES Americom, Inc. for the SES-15 Satellite

To whom it may concern,

This letter confirms that SES is aware that Global Eagle Entertainment, Inc., licensed by the Federal Communications Commission ("FCC") as Row 44, Inc. ("Row 44"), is planning to file an application seeking a modification to its blanket authorization (the "Modification Application") to operate technically identical Ku-band Earth Stations Aboard Aircraft ("ESAA") pursuant to ITU RR 5.504A and Section 25.227 of the Commission's rules (Call Sign E080100). The Modification Application will seek authority for Row 44's ESAA terminals to communicate with the SES-15 satellite at 129° W.L., under the current ESAA rules, including Section 25.227.

Based upon the representations made to SES by Row 44 concerning how it will operate on SES-15 according to its letter dated May 7, 2018:

- SES certifies that it has completed coordination as required under the FCC's rules and that the power density levels specified by Row 44 are consistent with any existing coordination agreements to which SES is a party with adjacent satellite operators within +/- 6 degrees of orbital separation from SES-15.
- If the FCC authorizes the operations proposed by Row 44, SES will include the power density levels specified by Row 44 in all future satellite network coordination with other operators of satellites adjacent to SES-15.

Yours Sincerely,

Kimberly M. Baum



Kimberly M. Baum
Vice President Spectrum Management & Development, Americas

**Federal Communications Commission
International Bureau
445 12th Street, S.W.
Washington, D.C. 20554**

8 May 2018

Subject: Engineering Certification of SES Americom, Inc. for the AMC-1 Satellite

To whom it may concern,

This letter confirms that SES is aware that Global Eagle Entertainment, Inc., licensed by the Federal Communications Commission ("FCC") as Row 44, Inc. ("Row 44"), is planning to file an application seeking a modification to its blanket authorization (the "Modification Application") to operate technically identical Ku-band Earth Stations Aboard Aircraft ("ESAA") pursuant to ITU RR 5.504A and Section 25.227 of the Commission's rules (Call Sign E080100). The Modification Application will seek authority for Row 44's ESAA terminals to communicate with the AMC-1 satellite at 130.9° W.L., under the current ESAA rules, including Section 25.227.

Based upon the representations made to SES by Row 44 concerning how it will operate on AMC-1 according to its letter dated May 7, 2018:

- SES certifies that it has completed coordination as required under the FCC's rules and that the power density levels specified by Row 44 are consistent with any existing coordination agreements to which SES is a party with adjacent satellite operators within +/- 6 degrees of orbital separation from AMC-1.
- If the FCC authorizes the operations proposed by Row 44, SES will include the power density levels specified by Row 44 in all future satellite network coordination with other operators of satellites adjacent to AMC-1.

Yours Sincerely,

Kimberly M. Baum