


APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
STA for SES-15 for AMC-1 @ 129.0 WL + AMC-1 @ 130.9 WL

1. Applicant

Name:	Row 44 Inc.	Phone Number:	2024166742
DBA Name:		Fax Number:	United States
Street:	c/o Global Eagle Entertainment Inc.	E-Mail:	dkeir@termansenter.com
City:	6100 Center Drive, Suite 1050 Los Angeles	State:	CA
Country:	USA	Zipcode:	90045
Attention:	Mr Simon McLellan		



GRANTED
International Bureau

File # SES-STA-20180515-00630
E080100 Call Sign 5A1-18 Grant Date
(or other identifier) 5A1-18
Term Dates 7-30-18 To: 7-30-18
From: 5A1-18
Approved: [Signature]

Applicant: Row 44, Inc.
Call Sign: E080100
File No.: SES-STA-20180515-00630
Special Temporary Authority (STA)



File # SES-STA-20180515-00630
E080100
Call Sign E080100 Grant Date 5-21-18
(or other identifier)
Term Dates
From: 5-21-18 To: 7-20-18
Approved: Paul E. Hayes

Row 44, Inc., is granted STA to operate for 60 days the authorized TECOM 0.62m model Ku-Stream and QEST 0.63 m model Q50000 earth station aboard aircraft (ESAA) terminals to transmit to the SES-15 satellite (Call Sign S2951) at the 129.15° W orbital location and AMC-1 satellite (Call Sign S2445) at the 130.9° W orbital location on 14.05-14.47 GHz (Earth-to-space) frequencies and receive in the conventional Ku-band frequencies (space-to-Earth), in addition to the 10.7-11.7 GHz (space-to-Earth) frequencies from SES-15 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 CONUS and its territories, International waters.
5. Operations in the bands 10.7-11.7 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. 47 C.F.R. § 2.106, Table of Frequency Allocation, International Note: NG52.
8. Operations shall not exceed the proposed parameters in the underlying application FCC IBFS File number SES-MFS-20180515-00624 for blanket authorization and shall not exceed the power as coordinated by satellite operator's certificate letter from SES-15 and AMC-1 satellites as provided in accordance with 47 C.F.R. §25.227(b)(2).
9. Any action taken or expense incurred as a result of operations pursuant to this STA 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-MFS-20180515-00624.
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 -
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 IB2018001553	
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 05/21/2018	
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: STA Request 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.) <div style="border: 1px solid black; padding: 5px;">Request for special temporary authority for an initial period of sixty (60) days commencing May 21, 2018 to operate up to 110 SAA antennas and 110 GSAA antennas using space segment capacity on the SES-15 satellite at 129 degrees W.L. and the AMC-1 satellite at 130.9 degrees W.L. prior to action on Row 44's application to modify its license to</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"; 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

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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 initial period of sixty (60) days commencing May 21, 2018 to operate up to 110 SAA antennas and 110 GSAA antennas using space segment capacity on the SES-15 satellite at 129 degrees W.L. and the AMC-1 satellite at 130.9 degrees W.L. prior to action on Row 44's application to modify its license to specify use of these satellites under its ESAA license (Call Sign E080100). 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 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

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