

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

AC BidCo LLC (“AC BidCo”), which holds a license to operate an earth station aboard aircraft (“ESAA”) network,¹ hereby requests special temporary authority (“STA”) for a period of 60 days commencing no later than May 24, 2019, to add three satellites as points of communication for ESAA operations with up to 100 AeroSat model HR6400 ESAA terminals and up to 100 ThinKom model 2Ku terminals:

- the Brazil-licensed Amazonas-2 satellite at 61° W.L.;
- the Tonga-licensed Telstar 18 VANTAGE (“T18V”) satellite at 138° E.L.;
- and the China-licensed AsiaSat 9 satellite at 122° E.L.

AC BidCo seeks STA pending Commission action on AC BidCo’s applications to add these satellites as authorized points of communication.²

AC BidCo seeks authority for the ESAA terminals to communicate with these additional satellites consistent with the parameters set forth in the Modification and Amendment. Uplinks to all three satellites will be in the 14-14.5 GHz uplink spectrum. Downlink operations with Amazonas-2 will be in the 10.95-11.2 and 11.7-12.2 GHz bands, with T18V in the 11.45-11.7 GHz band, and with AsiaSat 9 in the 11.7-12.2 GHz, 10.95-11.7 GHz, and 12.2-12.75 GHz bands.³ Communications with these satellites will comply with applicable coordination agreements with adjacent satellites, as demonstrated by the supporting letters provided with the AC BidCo Application. The only departure from the specifications described in the AC BidCo Application is that communications with Amazonas-2 will commence with a different teleport, call sign E120043, than the one mentioned in the Amendment, which has not yet been authorized to communicate in Ku-band frequencies with Amazonas-2.⁴

As discussed in the Modification and Amendment, Amazonas-2, T18V, and AsiaSat 9 are all eligible for authority to communicate with U.S.-licensed ESAA terminals, and complete

¹ Call Sign E120106, File No. SES-MFS-20180813-02152, granted Nov. 8, 2018 (the “AC BidCo ESAA License”).

² See Call Sign E120106, File Nos. SES-MFS-20190304-00227 (the “Modification”) & SES-AFS-20190401-00394 (the “Amendment,” and collectively, the “AC BidCo Application”).

³ AC BidCo incorporates by reference herein its request for any necessary waiver of the U.S. Table of Allocations to permit use of the 12.2-12.75 GHz frequencies on AsiaSat 9 for ESAA operations outside of U.S. airspace. See Modification, Attachment at 7.

⁴ See Amendment, Attachment at 8 n.1 (identifying call sign E891020 as the teleport for use with Amazonas-2 once the license for that earth station has been amended to authorize communications with satellites on the Commission’s Permitted Space Station List in the conventional Ku-band frequencies).

technical information regarding the satellites is already on file with the Commission or is included with the AC BidCo Application. AC BidCo seeks authority to use Amazonas-2 capacity to serve North America; T18V to serve Australia, New Zealand, Indonesia, and Malaysia; and AsiaSat 9 to serve China. Only Amazonas-2 will be used in U.S. airspace.

Grant of the requested STA will serve the public interest by allowing AC BidCo to meet urgent demand for additional ESAA capacity in these regions. Allowing AC BidCo to add satellites to its ESAA network will enhance its ability to provide in-flight broadband service to air travelers and airline crew members, promoting competition in this important market. Moreover, the AC BidCo Application demonstrates that the planned operations are fully consistent with Commission technical standards designed to ensure protection of other authorized communications networks.

AC BidCo emphasizes that the scope of this STA request is limited. AC BidCo is only seeking authority to add satellites as authorized points of communication for a limited number of ESAA terminals and is otherwise prepared to operate consistently with the terms and conditions set forth in the existing AC BidCo ESAA License. In addition, AC BidCo is willing to operate pursuant to the STA on an unprotected, non-harmful interference basis.

AC BidCo understands that any Commission grant of this STA will be without prejudice to the ultimate determination the Commission will make regarding the AC BidCo Application. In addition, AC BidCo acknowledges that any action taken pursuant to a grant of the requested STA will be at AC BidCo's own risk.

For the foregoing reasons, AC BidCo respectfully requests expedited grant of an STA to permit it to begin using the Amazonas-2, T18V, and AsiaSat 9 satellites to meet near-term demand for in-flight connectivity.