

Exhibit A

Land-Based Ka-Band Request for Special Temporary Authority

Systems and Software Enterprises, LLC, dba Zodiac Inflight Innovations ("*Zodiac*") seeks Special Temporary Authority ("STA"), pursuant to Section 25.120 of the Commission's Rules, for immediate operation for a period of 60 days (or until the subsequent license application is granted), commencing on May 23, 2019 or such other date provided by the Commission, in order to perform testing of a single unit of a land-based earth station in advance of a license application and grant. The STA, if granted, will provide for the testing of Zodiac's earth station, of an in-flight entertainment system that is used in conjunction with Inmarsat's Ka-band Global Xpress satellite system. ISAT US already holds a blanket license authority for what it describes as ESIMs (Earth Stations in Motion) that provide broadband communications on maritime and aeronautical platforms utilizing the Inmarsat 5F2 and Inmarsat 5F3 satellite networks. The instant STA proposal and a subsequent license application will cover operations in the 29.5-30.0 GHz (Earth-to-space) and 19.7-20.2 GHz (space-to-Earth) frequency bands. As indicated, *Zodiac* intends to apply promptly for a license to add the terminal for regular operations and, at that time, request any waivers of FCC technical rules that may be deemed necessary.

Allowing for operation pursuant to the requested STA is in the public interest because *Zodiac* has several enhancements to its in-flight entertainment and passenger information systems and need to test them immediately in order to make them available in a manner that will benefit the significant number of airline passengers that utilize those systems on a daily basis.

Land-Based Earth Station Description

This application seeks a 60 day STA for testing and demonstration of the same GTX Terminal that has previously been licensed by the FCC for ISAT, US¹. The uplink terminal will be operated at a

¹ See Call Signs E140114 and E140029.

single fixed location in Brea, Orange County, California. Even though this STA is requested for a 60-day period, Zodiac is currently preparing a license application for permanent use of this terminal. The terminal, which employs a 65cm x 19.5cm Honeywell 8200 VSAT antenna, will operate on the same frequencies and with the same parameters as the ISAT US “Aero 1” in-flight terminals already licensed by the Commission: 19.7-20.2 GHz (space-to-Earth) and 29.5-30.0 GHz (Earth-to-space).

Operations in the frequency bands requested herein are subject to the U.S. Table of Frequency Allocations in Section 2.106 of the Commission’s rules (“U.S. Table”) and the Ka-band plan adopted by the Commission. The FCC’s Ka-band plan designates the 19.7-20.2 GHz band and the 29.5-30.0 GHz band to GSO FSS on a primary basis. The Commission recently adopted rules for ESIM use of the Ka-band FSS frequency bands requested in this application².

Consequently, Zodiac submits that a satisfactory basis exists for the granting of the request by it for an STA to operate this land-based earth station on an immediate and short-term basis pending action on a permanent application for such a license.

² *Amendment of Parts 2 and 25 of the Commission’s Rules to Facilitate the Use of Earth Stations in Motion Communicating with Geostationary Orbit Space Stations in Frequency Bands Allocated to the Fixed Satellite Service*, Report and Order and Further Notice of Proposed Rulemaking, FCC 18-138 (rel. Sept. 27, 2018).