

## REQUEST FOR SPECIAL TEMPORARY AUTHORITY

AC BidCo LLC (“AC BidCo”), which holds a license to operate an earth station aboard aircraft (“ESAA”) network,<sup>1</sup> hereby requests special temporary authority (“STA”) for a period of 60 days commencing no later than August 30, 2019, to permit up to 100 AeroSat model HR6400 ESAA terminals and up to 100 ThinKom model 2Ku terminals to communicate in the conventional Ku-band frequencies with the Canadian-licensed Anik F1R satellite, which has been authorized to serve the U.S. at 107.3° W.L.<sup>2</sup> Grant of the requested STA will serve the public interest by allowing AC BidCo to respond to customer demand for additional capacity on flights over the United States and Canada. AC BidCo is preparing an application to modify its ESAA license to add Anik F1R as an authorized point of communications and seeks STA pending submission of and action on that modification application.

### Background

AC BidCo is currently authorized to operate two types of Ku-band terminals, AeroSat model HR6400 antennas designated as AES1 on the AC BidCo License and ThinKom model 2Ku antennas designated as AES2 on the license, with specified satellites for ESAA service in U.S. airspace, foreign airspace, and the airspace over international waters. AC BidCo’s license was issued based on demonstration that the proposed network would enhance competition in the provision of in-flight broadband service to air travelers and airline crew members and that the planned operations were fully consistent with technical standards designed to ensure protection of other authorized communications networks. In order to enhance and expand its ESAA operations, AC BidCo is preparing an application to modify the AC BidCo License to update the satellites authorized as points of communication for the AC BidCo network.

### STA Request

AC BidCo requests STA to commence communications with Anik F1R in the near term while it is completing preparation of the upcoming modification application. AC BidCo seeks authority to use Anik F1R capacity for ESAA operations on a primary basis in the 14-14.5 GHz uplink spectrum and the 11.7-12.2 GHz downlink spectrum, consistent with the Anik F1R Authorization and with the Commission’s orders in the ESAA proceeding.<sup>3</sup> Communications with the satellite will be supported by a teleport in Brewster, WA, call sign E960222.

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<sup>1</sup> Call Sign E120106, File No. SES-MFS-20190304-00227, granted July 22, 2019 (the “AC BidCo License”).

<sup>2</sup> Call Sign S2674, File No. SAT-PPL-20050504-00094, granted June 8, 2018, as corrected July 21, 2005 (the “Anik F1R Authorization”).

<sup>3</sup> *Revisions to Parts 2 and 25 of the Commission’s Rules to Govern the Use of Earth Stations Aboard Aircraft Communicating with Fixed-Satellite Service Geostationary-Orbit Space Stations*

Anik F1R will provide coverage of the United States and Canada. In support of this STA request, AC BidCo is attaching a letter confirming that operation of the AC BidCo ESAA terminals is consistent with coordination agreements with satellites operated within six degrees of Anik F1R.

The technical parameters of the proposed operations with Anik F1R are provided in the following table:

<b>Antenna</b>	<b>Maximum EIRP Density Per Carrier (dBW/4 kHz)</b>	<b>EIRP (dBW)</b>	<b>Emission Designators</b>
AES 1	13.58	44.5	As specified in the AC BidCo License
AES 2	29.52	54.3	As specified in the AC BidCo License

AC BidCo requires the ability to use additional capacity in the United States and Canada on an urgent basis to accommodate increased demand in that region. AC BidCo's existing North American space segment is heavily utilized, and adding Anik F1R will allow AC BidCo to supplement this capacity in order to ensure a high quality of service and allow AC BidCo to continue to compete effectively in the ESAA market.

AC BidCo emphasizes that the scope of this STA request is limited. AC BidCo is only seeking authority to add Anik F1R as an authorized point of communication for a limited number of ESAA terminals. AC BidCo is otherwise prepared to operate consistently with the terms and conditions set forth in the existing AC BidCo License. In addition, AC BidCo is willing to operate pursuant to the STA on an unprotected, non-harmful interference basis.

#### Public Interest Showing

Grant of the requested STA is consistent with Commission policy and will not adversely affect other authorized operations. AC BidCo's proposed operations with Anik F1R are consistent with Telesat's coordination agreements with adjacent satellite operators and will also conform to the terms of AC BidCo's agreements with the National Science Foundation and the

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*Operating in the 10.95-11.2 GHz, 11.45-11.7 GHz, 11.7-12.2 GHz and 14-14.5 GHz Frequency Bands*, Notice of Proposed Rulemaking and Report and Order, IB Docket Nos. 12-376 & 05-20, 27 FCC Rcd 16510 (2012); Second Report and Order and Order on Reconsideration, IB Docket No. 12-376, 29 FCC Rcd 4226 (2014).

National Aeronautics and Space Administration. In addition, AC BidCo will comply with power flux density limits to protect terrestrial services outside the U.S.

Grant of the proposed STA will allow AC BidCo to meet immediate demand for additional capacity over the United States and Canada, promoting competition in the provision of aeronautical services and expanding the availability of in-flight broadband to air travelers and crew members.

AC BidCo understands that any Commission grant of this STA will be without prejudice to the ultimate determination the Commission will make regarding AC BidCo's future modification 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.



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12 July 2019

Federal Communications Commission  
International Bureau  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

*Re: AC BidCo LLC Application for earth stations aboard aircraft (“ESAA”) terminals*

To Whom It May Concern:

This letter certifies that Telesat is aware that AC BidCo LLC (“AC BidCo”) is planning to seek authorization from the Federal Communications Commission (“FCC”) to operate Ku-band transmit/receive terminals AES1 and AES2 for the provision of Aeronautical Mobile Satellite Service (Call Sign E120106) and that AC BidCo seeks additional authorization for these aeronautical Ku-band earth stations to utilize the Anik F1R satellite at 107.3°W orbital location under the current FCC rules for Earth Stations Aboard Aircraft (“ESAA”), including Section 25.227.

Based on the information provided by AC BidCo, Telesat (i) certifies that the use of the ESAA transmit/receive terminals AES1 and AES2 by AC BidCo, installed and operated in accordance with the AC BidCo application and the above conditions, is consistent with the existing coordination agreements with all adjacent satellite operators within +/- 6 degrees from Anik F1R; and (ii) confirms that if the FCC authorizes the operations proposed by AC BidCo, Telesat will take into consideration the power density levels associated with such operations in future satellite network coordination with adjacent satellite operators.

Yours Sincerely,

A handwritten signature in black ink, appearing to be "B. Borna", written over a horizontal line.

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BAHRAM BORNA  
Senior Systems Engineer  
Telesat