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September 21, 2021

Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**Re: Submission pursuant to Section 1.65 of the Commission's Rules - File Nos. SES-LIC-20210628-00992 and SES-AMD-20210817-01483 (Call Sign E210125) and SES-STA-20210601-00877**

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. § 1.65, Speedcast Communications, Inc. ("Speedcast") hereby supplements its request to conduct lower-power operations pursuant to above-referenced earth station applications.

As the Commission is aware, in coordinating full-power operations, Speedcast has agreed to install radiofrequency ("RF") fencing with a minimum 25 dB of attenuation to mitigate the potential for interference into potentially affected terrestrial licensees.<sup>1</sup> This solution would address all potential interference concerns from full-power earth station uplink operations and would allow public notice and grant, subject to installation of the RF fencing.

Speedcast also requests authority for lower-power operations prior to installation of RF fencing. As indicated in the attached letter from its frequency coordinator, these lower-power operations satisfy the protection criteria for potentially affected terrestrial licensees and thus pose no threat of harmful interference. A draft Form 312 specifying the technical characteristics of the lower-power operations is also attached.

Given the need for expeditious consideration in view of the subject earth station's role in service restoration to Puerto Rico, Speedcast respectfully requests that its pending earth station application, as amended, be placed on public notice at the earliest practicable time.

Please do not hesitate to contact me with any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carlos M. Nalda", written in a cursive style.

Carlos M. Nalda  
*for Speedcast Communications, Inc.*

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<sup>1</sup> See Letter from Carlos M. Nalda to Marlene H. Dortch, Call Sign E210125, File Nos. SES-LIC-20210628-00992 and SES-AMD-20210817-01483 (Sept. 1, 2021).



September 15, 2021

Carlos Nalda  
LMI Advisors  
2550 M Street, NW  
Suite 300  
Washington, DC 20037

Re: C-Band Puerto Rico Coordination for Speedcast Communications, Inc.

Dear Carlos,

This letter responds to your request to confirm coordination status and our additional interference assessment for Speedcast Communications, Inc.'s ("Speedcast") proposed C-band operations in San Juan, Puerto Rico.

As you know, we have coordinated the operations proposed in Speedcast's fixed earth station license application (Call Sign E210125; File Nos. SES-LIC-20210628-00992 and SES-AMD-20210817-01483). Through their frequency coordinator, potentially affected terrestrial licensees have agreed to these operations subject to installation of radio frequency ("RF") fencing around the site within attenuation of no less than 25 dB to limit EIRP spectral density near the horizon and thereby mitigate potential interference from earth station uplink transmissions into terrestrial receivers.

In addition, we have analyzed the potential to operate the earth station on a temporary basis at lower power using the earth station's existing, smaller BUC (File No. SES-STA-20210601-00877). If the earth station operates in accordance with the power levels in the attached data sheet, we have concluded that this would satisfy both the short- and long-term interference protection objectives for all potentially affected terrestrial sites. As a result, operation at this lower power should not result in interference to any terrestrial licensee.

Please let me know if you have any additional questions.

Sincerely,

*Jeremy Lewis*

Jeremy Lewis  
Senior Systems Engineer  
Micronet Communications, Inc.  
(972)422-7200 x 109  
jlewis@micronetcom.com



## TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- a. Fixed Satellite  
 b. Mobile Satellite  
 c. Radiodetermination Satellite  
 d. Earth Exploration Satellite  
 e. Direct to Home Fixed Satellite  
 f. Digital Audio Radio Service  
 g. Other (please specify)

21. STATUS: Choose the button next to the applicable status. Choose only one.

- Common Carrier  Non-Common Carrier

22. If earth station applicant, check all that apply.

- Using U.S. licensed satellites  
 Using Non-U.S. licensed satellites

23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:

- Connected to a Public Switched Network  Not connected to a Public Switched Network  N/A

24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s).

- a. C-Band (4/6 GHz)  b. Ku-Band (12/14 GHz)  
 c. Other (Please specify upper and lower frequencies in MHz.)

Frequency Lower: Frequency Upper: (Please specify additional frequencies in an attachment)

## TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- a. Fixed Earth Station  
 b. Temporary-Fixed Earth Station  
 c. 12/14 GHz VSAT Network  
 d. Mobile Earth Station  
 e. Geostationary Space Station  
 f. Non-Geostationary Space Station  
 g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY:

- Transmit/Receive  Transmit-Only  Receive-Only  N/A

"For Space Station applications, select N/A."

## PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)

- a -- authorization to add new emission designator and related service  
 b -- authorization to change emission designator and related service  
 c -- authorization to increase EIRP and EIRP density  
 d -- authorization to replace antenna  
 e -- authorization to add antenna  
 f -- authorization to relocate fixed station  
 g -- authorization to change frequency(ies)  
 h -- authorization to add frequency  
 i -- authorization to add Points of Communication (satellites & countries)  
 j -- authorization to change Points of Communication (satellites & countries)  
 k -- authorization for facilities for which environmental assessment and radiation hazard reporting is required  
 l -- authorization to change orbit location  
 m -- authorization to perform fleet management  
 n -- authorization to extend milestones  
 o -- Other (Please specify)

## ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. **A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.**  Yes  No

**ALIEN OWNERSHIP** Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30-34.

|  |   |
|--|---|
| 29. Is the applicant a foreign government or the representative of any foreign government?   | <input type="radio"/> Yes <input checked="" type="radio"/> No                           |
| 30. Is the applicant an alien or the representative of an alien?   | <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A |
| 31. Is the applicant a corporation organized under the laws of any foreign government?   | <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A |
| 32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?  | <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A |
| 33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country? | <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A |
| 34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.  |   |

**BASIC QUALIFICATIONS**

|  |   |
|--|---|
| 35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules?<br>If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.  | <input type="radio"/> Yes <input checked="" type="radio"/> No |
| 36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.   | <input type="radio"/> Yes <input checked="" type="radio"/> No |
| 37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.  | <input type="radio"/> Yes <input checked="" type="radio"/> No |
| 38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances  | <input type="radio"/> Yes <input checked="" type="radio"/> No |
| 39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.   | <input type="radio"/> Yes <input checked="" type="radio"/> No |
| 40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer. |   |
| 41. 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. <i>See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.</i>    |   |
| 42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.  |   |
| 42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?<br><b>Permitted List</b>  |   |

43. Description. (Summarize the nature of the application and the services to be provided). **Operate a 2.4m fixed earth station in Puerto Rico.**

|  |                                    |
|--|------------------------------------|
| 43a. Geographic Service Rule Certification<br>By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.  | <input checked="" type="radio"/> A |
| By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.   | <input type="radio"/> B            |
| By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached. | <input type="radio"/> C            |

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**CERTIFICATION**

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing  
Ryan King

46. Title of Person Signing  
Vice President & Head of Legal

**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).**

**SATELLITE EARTH STATION AUTHORIZATIONS  
FCC Form 312 - Schedule B:(Technical and Operational Description)**

**FOR OFFICIAL USE ONLY**

Location of Earth Station Site

|                               |                    |                              |   |
|-------------------------------|--------------------|------------------------------|---|
| E1: Site Identifier:          | San Juan, PR       | E5. Call Sign:               |   |
| E2: Contact Name              | Victor Pinol       | E6. Phone Number:            | 305 914 1283  |
| E3. Street:                   |                    | E7. City:                    | Carolina  |
| E4. State                     | PR                 | E8. County:                  |   |
| E10. Area of Operation:       |                    | E9. Zip Code                 | 00987   |
| E11. Latitude:                | 18 ° 22 ' 37.4 " N | E10. Area of Operation:      | San Juan, PR  |
| E12. Longitude:               | 65 ° 56 ' 27.8 " W |                              |   |
| E13. Lat/Lon Coordinates are: |                    | <input type="radio"/> NAD-27 | <input checked="" type="radio"/> NAD-83 <input type="radio"/> N/A |
| E14. Site Elevation (AMSL):   | 14.04 meters       |                              |   |

|  |   |
|--|---|
| E15. If the proposed antenna(s) operate in the Fixed Satellite Service (FSS) with geostationary satellites, do(es) the proposed antenna(s) comply with the antenna gain patterns specified in Section 25.209(a) and (b) as demonstrated by the manufacturer's qualification measurement? If NO, provide as a technical analysis showing compliance with two-degree spacing policy. | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A |
|--|---|

|  |   |
|--|---|
| E16. If the proposed antenna(s) do not operate in the Fixed Satellite Service (FSS), or if they operate in the Fixed Satellite Service (FSS) with non-geostationary satellites, do(es) the proposed antenna(s) comply with the antenna gain patterns specified in Section 25.209(a2) and (b) as demonstrated by the manufacturer's qualification measurements? | <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A |
|--|---|

|  |   |
|--|---|
| E17. Is the facility operated by remote control? If YES, provide the location and telephone number of the control point. | <input type="radio"/> Yes <input checked="" type="radio"/> No |
|--|---|

|  |   |
|--|---|
| E18. Is frequency coordination required? If YES, attach a frequency coordination report as | <input checked="" type="radio"/> Yes <input type="radio"/> No |
|--|---|

|  |   |
|--|---|
| E19. Is coordination with another country required? If YES, attach the name of the country(ies) and plot of coordination contours as | <input type="radio"/> Yes <input checked="" type="radio"/> No |
|--|---|

|  |   |
|--|---|
| <b>E20. FAA Notification - (See 47 CFR Part 17 and 47 CFR part 25.113(c)) Where FAA notification is required, have you attached a copy of a completed FCC Form 854 and/or the FAA's study regarding the potential hazard of the structure to aviation?</b> | <input type="radio"/> Yes <input checked="" type="radio"/> No |
|--|---|

**FAILURE TO COMPLY WITH 47 CFR PARTS 17 AND 25 WILL RESULT IN THE RETURN OF THIS APPLICATION.**

**POINTS OF COMMUNICATION**

Satellite Name: OTHER | OTHER | If you selected OTHER, please enter the following:

E21. Common Name: EUTELSAT 113WA

E22. ITU Name:

E23. Orbit Location: 113 W.L.

E24. Country: Mexico

**POINTS OF COMMUNICATION (Destination Points)**

E25. Site Identifier: San Juan, PR

E26. Common Name:

E27. Country: USA

**ANTENNA**

| Site ID         | E28. Antenna Id                      | E29. Quantity | E30. Manufacturer               | E31. Model                   | E32. Antenna Size                               | E41/42. Antenna Gain Transmint and/or Recieve(____dBi at ____GHz) |   |                                      |
|-----------------|--------------------------------------|---------------|---------------------------------|------------------------------|---|---|---|--------------------------------------|
| San Juan, PR    | 2.4M                                 | 1             | AvL Technologies                | 2410                         | 2.4   | 38.0 dBi at 4.000   |   |                                      |
| San Juan, PR    | 2.4M                                 | 1             | AvL Technologies                | 2410                         | 2.4   | 41.6 dBi at 6.300   |   |                                      |
| E28. Antenna Id | E33/34. Diameter Minor/Major(meters) |               | E35. Above Ground Level(meters) | E36. Above Sea Level(meters) | E37. Building Height Above Ground Level(meters) | E38. Total Input Power at antenna flange(Watts)                   | E39. Maximum Antenna Height Above Rooftop(meters) | E40. Total EIRP for al carriers(dBW) |
| 2.4M            | 0.0/0.0                              |               | 3.0                             | 14.04                        | 0.0   | 52.33   | 0.0   | 58.79                                |

**FREQUENCY**

| E28. Antenna Id                      | E43/44. Frequency Bands(MHz) | E45. T/R Mode | E46. Antenna Polarization(H,V,L,R) | E47. Emission Designator | E48. Maximum EIRP per Carrier(dBW) | E49. Maximum ERIP Density per Carrier(dBW/4kHz) |
|--------------------------------------|------------------------------|---------------|------------------------------------|--------------------------|------------------------------------|---|
| 2.4M                                 | 4000 4200                    | R             | Horizontal and Vertical            | 35M0G7W                  | 0.0                                | 0.0   |
| E50. Modulation and Services Digital |                              |               |                                    |                          |                                    |   |
| 2.4M                                 | 6227 6263                    | T             | Horizontal and Vertical            | 35M0G7W                  | 58.79                              | 19.37   |
| E50. Modulation and Services Digital |                              |               |                                    |                          |                                    |   |
| 2.4M                                 | 6307 6343                    | T             | Horizontal and Vertical            | 35M0G7W                  | 58.79                              | 19.37   |
| E50. Modulation and Services Digital |                              |               |                                    |                          |                                    |   |

**FREQUENCY COORDINATION**

| E28. Antenna Id | E51. Satellite Orbit Type | E52/53. Frequency Limits(MHz) | E54/55. Range of Satellite Arc Eastern/Western Limit | E56. Earth Station Azimuth Angle Eastern Limit | E57. Antenna Elevation Angle Eastern Limit | E58. Earth Station Azimuth Angle Western Limit | E59. Antenna Elevation Angle Western Limit | E60. Maximum EIRP Density toward the Horizon(dBW/4kHz) |
|-----------------|---------------------------|-------------------------------|--|--|--|--|--|--|
| 2.4M            | Geostationary             | 4000 4200                     | 112.0/114.0  | 253.1  | 32.01                                      | 254.18   | 34.0                                       | 0.0  |
|                 | Geostationary             | 6227 6263                     | 112.0/114.0  | 253.1  | 32.01                                      | 254.18   | 34.0                                       | -28.25   |
|                 | Geostationary             | 6307 6343                     | 112.0/114.0  | 253.1  | 32.01                                      | 254.18   | 34.0                                       | -28.25   |

**REMOTE CONTROL POINT LOCATION**

|   |  |  |             |                   |  |                       |               |
|---|--|--|-------------|-------------------|--|-----------------------|---------------|
| E61. Call Sign  |  |  |             | E66. Phone Number |  |                       |               |
| NOTE: Please enter the callsign of the controlling station, not the callsign for which this application is being filed. |  |  |             |                   |  |                       |               |
| E62. Street Address   |  |  |             |                   |  |                       |               |
| E63. City   |  |  | E68. County |                   |  | E67/68. State/Country | E64. Zip Code |
|   |  |  |             |                   |  | /                     |               |

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