

November 2, 2021

Via IBFS

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

Re: Application of Anuvu Licensing Holdings LLC for Authority to Modify its Earth Stations Aboard Aircraft Blanket License (IBFS File Nos. SES-MFS-20210127-00153 & SES-AMD- 20210520-00826) – Ex Parte Letter

Dear Ms. Dortch:

Anuvu Licensing Holdings LLC (“Anuvu”) and its counsel met by conference call with members of the FCC’s International Bureau (the “Bureau”) staff in mid-August to discuss the above-referenced pending application for modification of Anuvu’s current Earth Stations Aboard Aircraft network authorization. During that discussion, Bureau staff raised the question whether the issuance of a partial grant of the application, covering all bands other than the 12.2-12.75 GHz band (the only portion subject to Petitions), would be an acceptable short-term measure. At that time, Anuvu expressed the hope that all the issues could be resolved quickly to allow final action during the early fall.

Anuvu is currently operating in a portion of the bands requested pursuant to three grants of special temporary authority (“STA”) covering the satellites that are the subject of the modification application – Eutelsat 139 West A (SES-STA-20210810-01358, granted 8-30-2021), Anik F-1R @ 107.3° W.L. & Hispasat 143 W-1 (SES-STA-20210825-01546, granted 9-20-2021), and Telesat Anik F-1 satellite @ 109.2 W.L. (SES-STA-20210825-01545, renewal pending). As the expiration dates of these authorizations neared, Anuvu recently filed two new applications to extend the STA operations. See FCC File Nos. SES-STA-20211025-01741 (for Anik F-1) and SES-STA-20211026-01749 (for Eutelsat 139WA).

To avoid the need for Anuvu to continue seeking additional STA extensions (the next of which would be due November 10, 2021, for Anik F-1R and Hispasat 143 W-1), it hereby requests that the Bureau issue a partial grant of its modification application, while deferring just the portion relating to the 12.2-12.75 GHz band that has been opposed. A partial grant would avoid the need for Anuvu to continue filing requests to extend its STA operations and for Division staff to consider and process these repetitive requests.

Despite the foregoing, because of the limited availability of capacity in the conventional Ku-band to serve areas that Anuvu would serve using 12 GHz spectrum, access to this band remains critical for the company to continue providing high quality in-flight connectivity to its users. Accordingly, while near term partial grant of the pending application will be helpful, Anuvu urges the Bureau to expedite final action on the remainder of the application, granting it authority to operate in a portion of the 12.2-12.75 GHz band subject to the conditions proposed in its application.

This letter is submitted pursuant to Section 1.1206 of the Commission's Rules consistent with the Satellite Division's designation of this proceeding as "permit-but-disclose." *See* FCC Public Notice, Satellite Communications Services Information: Actions Taken, Report No. SPB-02382 (released July 14, 2021).

Respectfully submitted,

s/ David S. Keir

David S. Keir

Counsel to Anuvu Licensing Holdings LLC

cc: Kerry Murray