

EXPLANATORY STATEMENT

Anuvu Licensing Holdings, LLC (“Anuvu”),¹ pursuant to Section 25.120(b) of the FCC’s Rules, hereby requests the extension of Special Temporary Authority (“STA”) for an additional period of sixty (60) days, beginning October 31, 2021, to operate its licensed Ku-band network of Earth Stations Aboard Aircraft (“ESAA”) (Call Sign E080100) using space segment capacity on the Eutelsat 139 West A satellite (“E139WA”) at 139.2° W.L. The E139WA satellite is on the FCC’s Permitted List of non-U.S. satellites granted access to the U.S. market. *See* FCC File No. SAT-PDR-20191017-00115; Call Sign S3055). Such authority was most recently granted for a period of 60 days on August 30, 2021. *See* FCC File No. SES-STA-20210810-01358.

Anuvu filed the underlying application seeking to modify its license on a permanent basis on January 27, 2021. *See* FCC File No. SES- MFS-20210127-00153. That application was placed on FCC Public Notice as Accepted for Filing on April 7, 2021. *See* FCC Public Notice, Satellite Communications Services: Satellite Radio Applications Accepted for Filing, Report No. SES-02353 (IB, rel. April 7, 2021).

Anuvu’s operations employing capacity on the E139WA satellite do not cause harmful interference to any adjacent satellites operating in accordance with FCC’s two-degree spacing policy. Included as an annex to its modification application is a coordination certification letter from Eutelsat, pursuant to Sections 25.228(a) and 25.220(d) of the Commission’s Rules, covering the proposed operation. The operations also comply with Anuvu’s existing, long-term coordination agreements (signed by its affiliate and predecessor licensee, Row 44, Inc.) with the National Science Foundation and the National Aeronautics and Space Administration.

Under Section 25.120(b)(1) of the FCC’s Rules, the International Bureau may grant an STA when the public interest supports the relief requested, and/or delay in the institution of temporary operations would be contrary to the public interest. *See* 47 C.F.R. § 25.120(b)(1). Such authority may be granted for a period not to exceed 60 days where the applicant has filed a request for permanent authority for the parameters and facilities requested. *See* 47 C.F.R. § 25.120(b)(3). This is the case here, where Anuvu has filed an application to modify its license permanently to permit access to E139WA.

Grant of the authority requested here will continue to promote the public interest by permitting Anuvu to provide high-quality service to its customers using capacity on the E139WA satellite. This capacity remains urgently required to provide sufficient coverage for service for domestic U.S. flight routes connecting cities in the southwestern United States, as well as routes serving the Pacific Ocean region. Grant of the requested STA is consistent with Commission policy and will not adversely affect other authorized operations. Anuvu acknowledges that any action taken pursuant to a grant of the requested STA will be at its own risk, and respectfully requests that the FCC grant it authority commencing as of October 31, 2021, for a period of sixty (60) days, to use the E139WA satellite as a point of communication in the Ku-band in the United States using the two types of antennas now operating under its FCC ESAA network license.

¹ Effective July 8, 2021, the name of the licensee has changed from GEE Licensing Holdings, LLC in connection with the rebranding of the former Global Eagle connectivity business as Anuvu. Anuvu Operations LLC is the parent company of the licensee.