

EXPLANATORY STATEMENT

Anuvu Licensing Holdings LLC, pursuant to Section 25.120(b) of the FCC's Rules, hereby requests Special Temporary Authority ("STA") for a period of sixty (60) days to operate its licensed Ku-band network of Earth Stations Aboard Aircraft ("ESAA") (Call Sign E080100) using space segment capacity on the Echostar 9 satellite ("E9") at 121° W.L. Anuvu is contemporaneously filing an application to modify its license on a permanent basis to specify long-term operation using E9 at 121° W.L. as a new point of communication. This proposed use is consistent with the operations approved for Echostar 9 in its current FCC license under Call Sign S2179. *See* FCC File No. SAT-MOD-20191108-00128.

Anuvu's operations employing capacity on the E9 satellite will not cause harmful interference to any adjacent satellites operating in accordance with FCC's two-degree spacing policy. It has included as an annex to its modification application a certification letter from Echostar covering the proposed operations. The proposed operations will 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 is also filing an application to modify its license permanently to permit access to E9 at the 121° W.L. orbital location for the duration of Echostar's operation of the satellite at that location.

Grant of the authority requested here will continue to promote the public interest by permitting Anuvu to provide continuing and enhanced service to its customers using capacity on the E9 satellite. This capacity is required to provide sufficient coverage for service along Southwest Airlines domestic flight routes connecting cities in Continental United States, as well as routes serving the Caribbean. 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 on or about July 19, 2022, for a period of sixty (60) days, to use the E9 satellite as a point of communication in the Ku-band in the United States using the two types of TECOM antennas now operating under its FCC ESAA network license.