

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

AC BidCo LLC (“AC BidCo”), which holds a license to operate an earth station aboard aircraft (“ESAA”) network,¹ hereby requests special temporary authority (“STA”) for a period of 60 days commencing on or before December 2, 2019, to permit up to 100 ThinKom model 2Ku terminals to transmit in the conventional Ku-band uplink frequencies, 14.0-14.5 GHz, using a wider bandwidth carrier. AC BidCo seeks STA pending Commission action on its modification application that seeks to add an emission designator reflecting the wider bandwidth, among other changes.²

Grant of the requested STA will serve the public interest by allowing AC BidCo to test and evaluate network configurations that will provide greater throughput and accommodate more simultaneous users of in-flight connectivity services. AC BidCo seeks to assess these new configurations during peak demand conditions over the upcoming holiday season, but AC BidCo must first complete an initial set of tests to optimize the configuration. Grant of the STA by December 2 is needed to allow AC BidCo to perform these preliminary tests prior to the holiday travel season.

The Form 312 Schedule B included in the Modification sets forth the full technical parameters of the proposed operations, but they are provided in the following table as well for the Commission’s convenience:

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 EIRP Density Per Carrier (dBW/4 kHz)
AES 2	14000-14500	T	Horizontal and Vertical	14M7G7D	47.25	11.56

AC BidCo emphasizes that the scope of this STA request is limited. Pending action on the Modification, AC BidCo is only seeking authority to use the wider bandwidth emissions with a limited number of ESAA terminals. AC BidCo is otherwise prepared to operate consistently with the terms and conditions set forth in its existing authorizations. In addition, AC BidCo is willing to operate pursuant to the STA on an unprotected, non-harmful interference basis.

Grant of the requested STA is consistent with Commission policy and will not adversely affect other authorized operations. AC BidCo’s proposed operations with a wider bandwidth are

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

² See Call Sign E120106, File No. SES-MFS-20191112-01456 (the “Modification”).

consistent with the coordination agreements of its target satellite operators and will also conform to the terms of AC BidCo's agreements with the National Science Foundation and the 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 evaluate innovative approaches for satisfying growing demand for additional capacity and more reliable service, 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 the Modification. 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.