Explanatory Statement

Global Eagle Telecom Licensing Subsidiary, LLC ("Global Eagle") seeks special temporary authority for an additional period of thirty (30) days to continue limited antenna testing using a single 1.2-meter Ku-band antenna at Dallas, Texas. The purpose of the testing is to evaluate new equipment for possible future use with Global Eagle's existing ESAA network (Call Sign E080100), including assessment of approaches to achieve improved data throughput. An initial 30-day STA was granted in FCC File No. SES-STA-20200114-00029 for a period of 30 days ending February 19, 2020. A timely-filed request for extension of that authority for an additional 30-day period was submitted to the FCC on February 12, 2020 and remains pending. *See* FCC File No. SES-STA-20200212-00154. Because Global Eagle anticipates that its antenna testing program could last up to five or six months, it is also separately requesting a longer-term STA for up to 180 days pursuant to Section 25.120(b)(2) of the Commission's Rules. *See* FCC Temporary File No. SES-STA-INTR2020-00466. Technical parameters for the test are provided in the "Antenna Test Technical Parameters" attachment to this Explanatory Statement.

Request for Continued Waiver of U.S. Footnote NG52

To permit the STA operations, Global Eagle was granted a waiver of Footnote NG52 of the U.S. Table of Allocations[1] under File No. SES-STA-20200114-00029 to permit the earth station to receive signals in the extended Ku-band at 11.45-11.7 GHz that originate from a U.S. domestic earth station located at Holmdel, New Jersey (Call Sign E070218). Such a waiver is necessary because Footnote NG52 expressly limits "use of the bands 10.7-11.7 GHz (space-to-Earth) ... by geostationary satellites in the fixed-satellite service (FSS) … to international systems, i.e., other than domestic systems."[2] As the planned test involves downlink transmissions from the AMC-6 satellite located at 83° West longitude in the U.S. domestic geostationary arc, and that space station does not have permission to transmit signals between domestic earth stations under its FCC license (S2347, FCC File No. SAT-MOD-20170628-00102), Global Eagle requires a narrow waiver of the rule to permit the planned operations.

The requested waiver continues to be in the public interest because it will facilitate the gathering of additional antenna performance information that is expected to permit enhancement of both international and domestic satellite services offered to small user terminals. Moreover, grant of the requested waiver does not undermine the purpose of the limitation to international operations, which is intended to avoid over-use of the extended Ku-band downlink by excluding domestic-only transmissions. The requested STA is consistent with this objective in that (1) AMC-6 is already authorized to use the requested frequencies for international operations, and therefore has existing transmit operations in the band to U.S. locations, (2) the use is limited

[1] *See* 47 C.F.R. §2.106, footnote NG52.

[2] *Id.*

to a single antenna location, and (3) the use is of limited duration. Accordingly, Global Eagle requests that STA be granted expeditiously for a period commencing at midnight on March 21, 2020 extending until April 20, 2020.

Antenna Test Technical Parameters

Antenna Specifications

Manufacturer	Model	Size	Antenna Gain
Skyware Global	Type 123, Class II, Ku-Band Tx/Rx Antenna	1.2 meters	Rx: 41.8 dBi @ 12.0 GHz, Tx: 43.2 dBi @ 14.3 GHz

Antenna Location

Geographic Coordinates	AGL (meters)	AMSL (meters)	Building Height	Height Above Rooftop
32°50'51.4"N, 96°51'56.2"W	32.9	145.0	31.7	3 meters

Frequency Use

Band (GHz)	Mode	Polarization	Emission	Max EIRP per carrier	Max EIRP Density Per Carrier
11.45 – 12.2	Receive	Vertical linear	72M0G7W	--	--
14.00– 14.5	Transmit	Horizontal linear	36M0G7W	57.18	-12.78

Point of Communication Data

Satellite	Orbital Location	Azimuth (°)	Elevation (°)
AMC-6	83°W.L.	155.6	48.9