

EXPLANATORY STATEMENT

Anuvu Licensing Holdings, LLC (“Anuvu”),¹ pursuant to Section 25.120(b) of the FCC’s Rules, hereby requests an extension of Special Temporary Authority (“STA”) for an additional period of sixty (60) days, beginning October 28, 2021, to continue operating its licensed Ku-band network of Earth Stations Aboard Aircraft (“ESAA”) (Call Sign E080100) using space segment capacity on the Telesat Anik F-1 satellite (“Anik F-1”) at 109.2° W.L.² Anuvu was granted an STA in FCC File No. SES-STA-20210127-00173 for an initial period of 60-days on February 11, 2021 based on information submitted in its pending application to modify its license on a permanent basis to specify operation using additional points of communication, including Anik F-1 at 109.2° W.L. This authority was extended for additional periods of sixty (60) days on both April 12, 2021 and June 28, 2021 in FCC File Nos. SES-STA-20210406-00616 and SES-STA-20210610-00925 with the extensions running through August 27, 2021. A request to further extend the STA was filed on August 25, 2021 in FCC File No. SES-STA-20210825-01545 but has not yet been acted upon.

The proposed continued use is consistent with the petition for declaratory ruling filed on January 8, 2021 by Telesat seeking to add Anik F-1 to the U.S. Permitted List at this orbital location. *See* FCC File No. SAT-PPL-20210108-00005 and FCC Public Notice, Satellite Policy Branch Information; Space Station Applications Accepted for Filing, Report No. SAT-01527 (rel. Feb. 5, 2021). Telesat’s Petition includes a full showing with respect to the legal and technical basis for grant of the authority requested and support for its request to operate the satellite in an inclined orbit. The satellite was previously granted U.S. market access at the 107.3° W.L. orbital location under Call Sign S2745 (FCC File No. SAT-PDR-20000420-00083).

Anuvu’s operations employing capacity on the Anik F-1 satellite have not caused harmful interference to any adjacent satellites operating in accordance with FCC’s two-degree spacing policy. It included as an annex to its modification application a coordination certification letter from Telesat, pursuant to Sections 25.228(a) and 25.220(d) of the Commission’s Rules, covering the proposed operation. 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.

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.

² The initial STA for these operations was granted to Global Eagle Telecom Licensing Subsidiary, LLC, Debtor-in-Possession, Anuvu’s predecessor in interest. The underlying ESAA license was assigned to GEE Licensing Holdings, LLC (now Anuvu) in a transaction approved by the FCC on January 19, 2021 and consummated by the parties on March 23, 2021. *See* FCC File No. SES-ASG-20201022-01156.

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 also filed an application to modify its license permanently to permit access to Anik F-1 at the 109.2° W.L. orbital location for the duration of Telesat's operation of the satellite at that location, and has been operating with no harmful interference for a period of nearly four months.

Grant of the extended STA requested here will promote the public interest by permitting Anuvu to provide continuing service to its customers using capacity on the Anik F-1 satellite. This capacity is required to provide sufficient coverage for service along Southwest Airlines domestic flight routes connecting cities in the Southeastern United States, as well as routes serving the Caribbean. Grant of the initial STA to use capacity on Anik F-1 at this location restored Anuvu's ability to use space segment at this orbital location, where it was previously authorized to operate with the Telesat Telstar 12 satellite (S2462), which was decommissioned. Grant of the requested STA extension 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 October 28, 2021, for a period of sixty (60) days, to continue its use of the Anik F-1 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.