

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Kuiper Systems LLC

Application for Gateway Earth Station
Authorization

Call Sign _____

File No. SES-LIC-20260407-00874

APPLICATION FOR GATEWAY EARTH STATION AUTHORIZATION

Kuiper Systems LLC (“Amazon Leo”), a wholly owned subsidiary of Amazon.com Services LLC (collectively “Amazon”), seeks authority to operate a fixed gateway earth station (“gateway”) in Gaines County, Texas. This narrative demonstrates why authorizing this gateway would serve the public interest and explains how Amazon will operate pursuant to the Commission’s rules.

I. INTRODUCTION AND BACKGROUND

On July 30, 2020, the Commission authorized Amazon to deploy a non-geostationary satellite orbit (“NGSO”) system of more than 3,000 satellites to provide service using certain fixed-satellite service (“FSS”) and mobile-satellite service (“MSS”) Ka-band frequencies (the “Gen 1 System”).¹ On February 10, 2026, the Commission granted Amazon’s request to operate the Gen

¹ See *Kuiper Systems LLC, Application for Authority to Deploy and Operate a Ka-band Non-Geostationary Satellite Orbit System*, Order and Authorization, 35 FCC Rcd 8324, 8324-25 ¶¶ 1, 4 (2020) (“2020 Gen 1 Grant”). See also *Kuiper Systems LLC, Request for Modification of the Authorization for the Kuiper NGSO Satellite System*, Order and Authorization, 38 FCC Rcd 1112 (SB 2023) (“Gen 1 Orbital Debris Modification Order”) (granting Amazon’s updated orbital debris mitigation plan); *Kuiper Systems LLC, Request for Modification of the Authorization for the Kuiper NGSO Satellite System*, Order and Authorization, 39 FCC Rcd 2180 (SB 2024) (granting Amazon’s request to modify orbital parameters and reduce constellation size); *Kuiper Systems LLC, Grant Stamp*, ICFS File No. SAT-MOD-20230201-00013 (granted Apr. 5, 2024) (granting Amazon’s request to modify processing round coordination requirements); *Kuiper Systems LLC, Request for Modification of the Authorization for the Kuiper NGSO Satellite System*, Order and Authorization, 39 FCC Rcd 3987 (SB 2024) (modifying conditions relating to equivalent power flux density limits).

1 System in additional Ka-band and V-band frequencies, and to deploy and operate a second-generation satellite system (“Gen 2 System”) and a polar system (“Polar System”) (collectively, the “Amazon Leo Systems”) of NGSO low-Earth orbit satellites in certain Ka-, Ku-, and V-band frequencies.²

Since receiving its 2020 authorization, Amazon has taken significant steps to support deployment of the Amazon Leo Systems and advance its goal of providing affordable, reliable, high-quality connectivity to customers and communities around the world. It has committed to investing more than \$10 billion in Amazon Leo and has leveraged the company’s deep in-house expertise in advanced technology and high-performance networks and services to design and deploy the Amazon Leo Systems satellites.³ Amazon successfully launched its first commercial satellites in April 2025 and anticipates providing commercial service later this year.⁴

With this application, Amazon seeks authority to operate the proposed gateway in Gaines County, Texas. The gateway will consist of six (6) technically identical 2.4-meter antennas that will communicate with the Amazon Leo Systems (call signs S3105/S3051) in the frequency bands 27.5-30.0 GHz (Earth-to-space) and 17.8-18.6 GHz and 18.8-20.2 GHz (space-to-Earth). No more than four (4) antennas will transmit on the same channel at any one time.

² Kuiper Systems LLC, Grant Stamp, ICFS File Nos. SAT-LOA-20211104-00145, SAT-AMD-20250311-00068 (granted in part Feb. 10, 2026) (Call Sign S3105/S3051) (“2026 Amazon Leo Grant”).

³ See Amazon Staff, *Amazon Receives FCC Approval for Project Kuiper Satellite Constellation*, Amazon News (July 30, 2020), <https://tinyurl.com/yc23a5w4>; Rajeev Badyal, *Project Kuiper is now Amazon Leo*, Amazon News (Nov. 13, 2025), <https://tinyurl.com/2e58aacx>; Annie Palmer, *Amazon Gets FCC Approval to Launch 4,500 Leo Internet Satellites*, CNBC (Feb. 10, 2026), <https://tinyurl.com/y6bhtxhj>.

⁴ See Amazon Staff, *Here’s What to Expect from Project Kuiper’s First Full-Scale Satellite Launch*, Amazon News (Apr. 29, 2025), <https://tinyurl.com/yusx9avk>; Andy Jassy, *CEO Andy Jassy’s 2025 Letter to Shareholders*, Amazon News (Apr. 9, 2026), <https://tinyurl.com/5eu5je6v>.

II. PUBLIC INTEREST BENEFITS

When the Commission originally authorized the Amazon Leo Systems, it “conclude[d] that grant of [Amazon Leo]’s application would advance the public interest” because the Amazon Leo Systems were “designed to increase the availability of high-speed broadband service to consumers, government, and businesses.”⁵ The same public interest considerations that supported grant of the original space station application support granting this gateway application now. Grant of this gateway application will allow Amazon to accelerate its ability to bring satellite broadband connectivity to tens of millions of unserved and underserved consumer and enterprise customers, enabling growth in local economies, improving access to government services, and supporting public safety and disaster relief communications.⁶

III. SPECTRUM USE AND SHARING

Amazon will adhere to all applicable International Telecommunication Union (“ITU”) and Commission requirements as well as pertinent future Commission rulemakings governing NGSO Ka-band gateways. When sharing spectrum, Amazon will operate pursuant to the Amazon Leo Systems authorizations and the Commission’s rules, as discussed below.

A. Amazon Leo Systems Gateway Transmit Frequencies

The gateway will transmit to Amazon Leo Systems satellites in the frequencies listed in Table 1 and follow relevant sharing requirements in the Commission’s rules.

⁵ 2020 Gen 1 Grant, 35 FCC Rcd at 8324 ¶ 3.

⁶ See, e.g., *In re Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, Fourteenth Broadband Deployment Report, 36 FCC Rcd 836, 837 ¶ 2 (2021) (noting that 14.5 million Americans lack access to fixed terrestrial broadband with benchmark download and upload speeds of 25 Mbps and 3 Mbps, respectively).

Table 1: Amazon Leo Systems Gateway Transmit Frequencies

Transmit Frequencies (GHz)	Status⁷
27.5-28.35	FSS secondary to UMFUS ⁸ NGSO FSS secondary to GSO FSS
28.35-28.6	NGSO FSS secondary to GSO FSS
28.6-29.1	NGSO FSS primary
29.1-29.5	NGSO MSS feeder link co-primary
29.5-30.0	NGSO FSS secondary to GSO FSS

1. 27.5-28.35 GHz (NGSO FSS secondary to UMFUS and GSO FSS)

NGSO FSS may transmit on a secondary basis without providing interference protection to the Upper Microwave Flexible Use Service (“UMFUS”) in the 27.5-28.35 GHz band.⁹ Exhibit A, the Comsearch Report, establishes that Amazon has coordinated with UMFUS licensees consistent with section 101.103(d).¹⁰ Exhibit D, the UMFUS analysis, demonstrates how the gateway satisfies the section 25.136(a) protection criteria and, therefore, does not need to protect future UMFUS deployments.¹¹

⁷ See generally 47 C.F.R. § 2.106; *In re Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 7809 (2017) (“NGSO FSS Order”); *id.* at 7850-51 Appendix B (“Ka-band Plan”).

⁸ The Commission has recently adopted modernized rules to permit NGSO and GSO FSS sharing. See *Modernizing Spectrum Sharing for Satellite Broadband*, Report and Order, SB Docket No. 25-157, FCC 26-26 (rel. May 1, 2026) (“NGSO-GSO Spectrum Sharing Order”).

⁹ See 47 C.F.R. §§ 2.106, 25.136; *International Bureau Issues Guidance on Siting Methodologies for Earth Stations Seeking to Operate in the 24.75-25.25 GHz, 27.5-28.35 GHz, 37.5-40 GHz, 47.2-48.2 GHz, and 50.4-51.4 GHz Frequency Bands to Demonstrate Compliance with Section 25.136*, Public Notice, 35 FCC Rcd 6347 (IB 2020).

¹⁰ See 47 C.F.R. § 101.103(d); Exhibit A.

¹¹ See 47 C.F.R. § 25.136(a); Exhibit D.

NGSO FSS must also operate on an unprotected, non-interference basis with respect to geostationary satellite orbit (“GSO”) FSS networks in this band.¹² Amazon does not claim interference protection from GSO FSS in this band and will otherwise comply with the terms of the Amazon Leo Systems authorizations.¹³ In addition, Amazon certifies that it will comply with the applicable equivalent power-flux density (“EPFD”) limits in ITU Radio Regulations Article 22 and Resolution 76.¹⁴

2. 28.35-28.6 GHz and 29.5-30.0 GHz (NGSO FSS secondary to GSO FSS systems)

NGSO FSS may transmit on a secondary basis to GSO FSS in the 28.35-28.6 GHz and 29.5-30.0 GHz bands.¹⁵ Amazon does not claim interference protection from GSO FSS in these bands and certifies that it will comply with the applicable EPFD limits in ITU Radio Regulations Article 22 and Resolution 76.¹⁶

3. 28.6-29.1 GHz (NGSO FSS primary)

NGSO FSS may transmit on a primary basis in the 28.6-29.1 GHz band.¹⁷ Amazon’s operations as NGSO FSS possess primary status in the band.¹⁸

¹² See *NGSO FSS Order*, 32 FCC Rcd at 7817 ¶ 23.

¹³ See *2020 Gen 1 Grant*, 35 FCC Rcd at 8328 ¶ 16; *2026 Amazon Leo Grant*.

¹⁴ See 47 C.F.R. §§ 25.108, 25.115(f)(1), 25.146(a)(2); ITU Radio Regulations Article 22 and Resolution 76 (WRC-15) (incorporated by reference at 47 C.F.R. § 25.108).

¹⁵ See 47 C.F.R. § 2.106; Ka-band Plan.

¹⁶ See 47 C.F.R. §§ 25.115(f)(1), 25.146(a)(2).

¹⁷ See 47 C.F.R. § 2.106; Ka-band Plan.

¹⁸ See *2020 Gen 1 Grant*, 35 FCC Rcd at 8327 ¶ 11; 47 C.F.R. § 25.261. In the 28.5-29.1 GHz band, Amazon will not cause harmful interference to, or claim protection from, grandfathered Fixed Service (“FS”) stations as required by the Commission’s rules. See 47 C.F.R. § 2.106(d)(62).

4. 29.1-29.5 GHz (NGSO MSS feeder link co-primary)

NGSO MSS feeder links may transmit on a co-primary basis with the Local Multipoint Distribution Service (“LMDS”) in the 29.1-29.25 GHz band and GSO FSS in the 29.25-29.5 GHz band.¹⁹ As described in the following sub-sections, the Commission has granted Amazon authority to operate NGSO MSS feeder links in this band and, therefore, the gateway may operate on a primary basis.²⁰

a. NGSO MSS feeder link

To share with other co-primary NGSO MSS feeder link systems, Amazon will coordinate use of the band with NGSO system operators not included in the March 2020 processing round before commencing service²¹ and employ the section 25.261 spectrum-sharing framework with NGSO system operators in the March 2020 processing round while operating service.²²

b. LMDS

To share with LMDS, Amazon will coordinate as required by the Commission’s rules.²³

c. FS

To share with FS, Amazon will not cause harmful interference to, or claim protection from, grandfathered FS stations as required by the Commission’s rules.²⁴

¹⁹ See 47 C.F.R. § 2.106; Ka-band Plan.

²⁰ See *2020 Gen 1 Grant*, 35 FCC Rcd at 8325, 8330-31 ¶¶ 5 n.7, 24-25.

²¹ Before using this band, Amazon will coordinate with NGSO MSS feeder link systems using the same frequencies and polarizations as Amazon. See *Gen 1 Orbital Debris Modification Order*, 38 FCC Rcd at 1122 ¶ 39; *2020 Gen 1 Grant*, 35 FCC Rcd at 8345 ¶ 59(i).

²² See *Gen 1 Orbital Debris Modification Order*, 38 FCC Rcd at 1122 ¶ 39; *2020 Gen 1 Grant*, 35 FCC Rcd at 8345 ¶ 59(i); 47 C.F.R. § 25.261.

²³ See 47 C.F.R. §§ 25.203, 101.103(d).

²⁴ See 47 C.F.R. § 2.106(d)(62).

B. Amazon Leo Systems Gateway Receive Frequencies

The gateway will receive transmissions from the Amazon Leo Systems in the frequencies listed in Table 2 and follow relevant sharing requirements in the Commission's rules.²⁵

Table 2: Amazon Leo Systems Gateway Receive Frequencies

Frequencies (GHz)	Status ²⁶
17.8-18.3	FSS secondary to FS ²⁷
18.3-18.6	NGSO FSS secondary to GSO FSS
18.8-19.3	NGSO FSS primary
19.3-19.4 and 19.6-19.7	NGSO FSS secondary to FS, NGSO MSS FL, and GSO FSS
19.4-19.6	NGSO MSS feeder link co-primary
19.7-20.2	NGSO FSS secondary to GSO FSS

1. 17.8-18.3 GHz, 19.3-19.4 GHz, and 19.6-19.7 GHz (NGSO FSS secondary to FS)

NGSO FSS may receive on a secondary basis to FS in the 17.8-18.3, 19.3-19.4, and 19.6-19.7 GHz bands.²⁸ To share with FS, Amazon will meet the power flux density limits in ITU Radio Regulations Article 21.²⁹ Exhibit A, the Comsearch Report, confirms that no additional limitations are necessary.³⁰

²⁵ Before operating in these bands, Amazon will complete coordination with U.S. Federal systems. *See* 47 C.F.R. § 2.106(c)(334); *Gen 1 Orbital Debris Modification Order*, 38 FCC Rcd at 1122 ¶ 43; *2020 Gen 1 Grant*, 35 FCC Rcd at 8345 ¶ 59(m).

²⁶ *See generally* 47 C.F.R. § 2.106. *See also generally* *NGSO FSS Order*; Ka-band Plan.

²⁷ The Commission has recently adopted modernized rules to permit NGSO and GSO FSS sharing. *See NGSO-GSO Spectrum Sharing Order*.

²⁸ *See* 47 C.F.R. § 2.106(d)(166); Ka-band Plan.

²⁹ *See Gen 1 Orbital Debris Modification Order*, 38 FCC Rcd at 1121 at ¶¶ 34-35; *2020 Gen 1 Grant*, 35 FCC Rcd at 8327, 8344 ¶¶ 13, 59(d)-(e).

³⁰ *See* Exhibit A.

2. 18.3-18.6 GHz and 19.7-20.2 GHz (NGSO FSS secondary to GSO FSS)

NGSO FSS may receive on an unprotected, non-interference basis with respect to GSO FSS in the 18.3-18.6 GHz and 19.7-20.2 GHz bands.³¹ The Commission has adopted new rules which, once effective, will allow NGSO operators to pursue performance-based alternative criteria for GSO-NGSO sharing in these bands in lieu of certifying to compliance with relevant ITU EPFD limits as currently required.³² To the extent necessary during the pendency of these new rules and consistent with the Amazon Leo Systems authorizations,³³ Amazon requests a waiver of the EPFD certification requirements in Sections 25.115(f)(1) and 25.146(a)(2) of the Commission's rules with respect to the 18.3-18.6 GHz and 19.7-20.2 GHz bands for the gateway.

The Commission may waive any of its rules if there is "good cause" to do so.³⁴ Waiver is appropriate where "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest" better than strict adherence to the rule.³⁵ Generally, the Commission waives its rules where the relief requested would not undermine the policy objective of the rule in question and would otherwise serve the public interest.³⁶ These criteria are met here. The Commission recently found that the decade-old EPFD limits are "needlessly prescriptive, outdated, and overprotective of GSO operations," and strict adherence to these limits would only continue to "unreasonably constrain services by innovative new NGSO systems."³⁷ To address

³¹ See 47 C.F.R. § 2.106; Ka-band Plan.

³² *NGSO-GSO Spectrum Sharing Order*, App. A; 47 C.F.R. §§ 25.115(f)(1), 25.146(a)(2).

³³ Amazon requests such a waiver for the gateway's communications with the Amazon Leo Gen 1, Gen2, and Polar Systems in the 18.3-18.6 GHz and 19.7-20.2 GHz bands only to the extent consistent with the Commission's authorization of these systems at the time that the Commission rules on this waiver request.

³⁴ See 47 C.F.R. § 1.3; *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

³⁵ *Northeast Cellular*, 897 F.2d at 1166.

³⁶ *WAIT Radio*, 418 F.2d at 1157.

³⁷ *NGSO-GSO Spectrum Sharing Order* ¶ 26.

these limitations, the Commission recently adopted new rules which provide for performance-based alternative criteria for GSO-NGSO sharing in the 18.3-18.6 GHz and 19.7-20.2 GHz bands.³⁸ It has similarly already found that permitting the Amazon Leo Gen 2 and Polar Systems to exceed the EPFD limits in these bands within the United States would serve the public interest.³⁹ Granting Amazon's waiver request here for the gateway to operate in the 18.3-18.6 GHz and 19.7-20.2 GHz bands consistent with the Amazon Leo Systems authorizations and the Commission's new performance-based framework would therefore serve the public interest by promoting NGSO innovation, and would not compromise the objective of protecting GSO operations in these bands. This waiver is necessary only during the interim period before the Commission's modernized rules take effect.

3. 18.8-19.3 GHz (NGSO FSS primary)

NGSO FSS may receive on a primary basis in the 18.8-19.3 GHz band.⁴⁰ Amazon's operations are licensed as NGSO FSS and, therefore, possess primary status in the band.⁴¹

4. 19.3-19.4 GHz and 19.6-19.7 GHz (NGSO FSS secondary to GSO FSS)

NGSO FSS may receive on a secondary basis with respect to GSO FSS in the 19.3-19.4 GHz and 19.6-19.7 GHz bands.⁴² To share with GSO FSS, Amazon will neither cause harmful interference to, nor claim protection from harmful interference from, GSO FSS.⁴³

³⁸ See *NGSO-GSO Spectrum Sharing Order* ¶¶ 11-14, App. A

³⁹ *2026 Amazon Leo Grant* at 5-6. Amazon has requested modification of its Gen 1 System license to remove the conditions that require compliance with the current EPFD limits in the United States. See Letter from Emily Hsu, Corporate Counsel, Kuiper Systems LLC, an Amazon subsidiary, to Marlene H. Dortch, Secretary, FCC, ICFS File Nos. SAT-MOD-20210806-00095, SAT-AMD-20230329-00067 (July 10, 2026).

⁴⁰ See 47 C.F.R. § 2.106; Ka-band Plan.

⁴¹ See *2020 Gen 1 Grant*, 35 FCC Rcd at 8327 ¶ 11.

⁴² See 47 C.F.R. § 2.106; Ka-band Plan; *NGSO FSS Order*, 32 FCC Rcd at 7815-16 ¶ 19.

⁴³ See 47 C.F.R. § 2.105(c)(2).

5. 19.3-19.4 GHz and 19.6-19.7 GHz (NGSO FSS secondary to NGSO MSS feeder link)

NGSO FSS may receive on a secondary basis to NGSO MSS feeder link systems in the 19.3-19.4 and 19.6-19.7 GHz bands.⁴⁴ To share with NGSO MSS feeder links, Amazon will coordinate use of the band with NGSO system operators not in the March 2020 processing round before commencing service⁴⁵ and employ the section 25.261 spectrum-sharing framework with NGSO system operators in the March 2020 processing round while operating service.⁴⁶

6. 19.4-19.6 GHz (NGSO MSS feeder link co-primary)

NGSO MSS feeder links may receive on a co-primary basis with FS in the 19.4-19.6 GHz band.⁴⁷ To share with co-primary MSS feeder link systems, Amazon will coordinate use of the band with operators not in the March 2020 processing round before commencing service and employ the section 25.261 spectrum-sharing framework with operators in the March 2020 processing round while operating service.⁴⁸

IV. ANTENNA PATTERN

There are no Commission standards for NGSO Ka-band gateway antenna pattern performance. The available standards consider only GSO Ku-/Ka-band or NGSO Ku-band operations because the Commission has “not yet determined what off-axis gain envelopes might be appropriate for [Ka-band gateways] operating with NGSO FSS space stations, either to facilitate

⁴⁴ See 47 C.F.R. § 2.106; Ka-band Plan.

⁴⁵ Before using this band, Amazon will coordinate with NGSO MSS feeder link systems using the same frequencies and polarizations as Amazon. See *Gen 1 Orbital Debris Modification Order*, 38 FCC Rcd at 1122 ¶ 39; *2020 Gen 1 Grant*, 35 FCC Rcd at 8345 ¶ 59(i); 47 C.F.R. § 25.261.

⁴⁶ See *Gen 1 Orbital Debris Modification Order*, 38 FCC Rcd at 1122 ¶ 39; *2020 Gen 1 Grant*, 35 FCC Rcd at 8345 ¶ 59(i); 47 C.F.R. § 25.261.

⁴⁷ See 47 C.F.R. § 2.106; Ka-band Plan.

⁴⁸ Before using this band, Amazon will coordinate with NGSO MSS feeder link systems using the same frequencies and polarizations as Amazon. See *Gen 1 Orbital Debris Modification Order*, 38 FCC Rcd at 1122 ¶ 39; *2020 Gen 1 Grant*, 35 FCC Rcd at 8345 ¶ 59(i); 47 C.F.R. § 25.261.

NGSO-to-NGSO or NGSO-to-GSO interference protection.”⁴⁹ Amazon nonetheless will comply with the section 25.209(a)(1) mask for GSO Ka-band earth station antennas, as illustrated in Exhibit C’s simulated antenna pattern.⁵⁰

V. RADIATION HAZARD ANALYSIS

Exhibit B, the Radiation Hazard Analysis, confirms that Amazon complies with relevant Commission standards and demonstrates there is no risk of radiation exposure beyond the acceptable limits.⁵¹ To further protect the general public, Amazon will site the gateway either behind a fence or on private commercial property with limited access. Trained technicians responsible for operating the gateway will turn off and secure the transmitters before performing any maintenance work.

VI. FAA NOTIFICATION

For an antenna structure of 6.1 meters or less in height above ground level, the Commission requires no Federal Aviation Administration (“FAA”) notification.⁵² Amazon’s antenna structure for the gateway measures 6.1 meters or less in height above ground level and requires no FAA notification.⁵³

⁴⁹ *In re Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Second Report and Order, 30 FCC Rcd 14713, 14784 ¶ 213 (2015). *See also* *NGSO FSS Order*, 32 FCC Rcd at 7827 ¶¶ 54-55 & n.121 (declining to adopt NGSO gateway antenna performance standards). *See generally* 47 C.F.R. §§ 25.132, 25.209.

⁵⁰ *See* 47 C.F.R. § 25.209(a)(1); Exhibit C.

⁵¹ *See* FCC OET Bulletin No. 65, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields* (Aug. 1997), <https://bit.ly/3SCjsBB>; 47 C.F.R. § 1.1310; Exhibit B.

⁵² *See* 47 C.F.R. § 17.2 (defining antenna structure as a structure that is constructed or used to transmit and/or receive radio energy or that supports antennas that transmit and/or receive radio energy and other appurtenances mounted thereon). *See also id.* §§ 17.7(e), 25.115(j).

⁵³ The maximum overall height of the antenna structure is 4 meters. Amazon provided this value in Form 312, Schedule B, field E35 (Above Ground Level (meters)) pursuant to the form’s instruction to provide “Maximum Antenna Height Above Ground Level (meters)” in this field. The height of the antenna structure from centerline is 2.74 meters. Amazon provided this value in Exhibit A (Comsearch Report).

VII. CONCLUSION

Amazon has satisfied the Commission's licensing standards for NGSO Ka-band gateways, and grant of the application is in the public interest. Prompt grant of this application will accelerate the deployment of the Amazon Leo Systems and its ability to expand broadband access for consumers, schools, hospitals, businesses, and other organizations across the United States.

Respectfully submitted,

/s/ Negheen Haya Sanjar

Negheen H. Sanjar
Corporate Counsel

Kuiper Systems LLC,
an Amazon subsidiary

September 1, 2026

EXHIBIT A
COMSEARCH REPORT

**FREQUENCY COORDINATION AND INTERFERENCE
ANALYSIS REPORT**

Prepared for
Kuiper Systems LLC
SEMINOLE, TX
Satellite Earth Station

Prepared By:
COMSEARCH
21515 Ridgetop Circle, Suite 300
Sterling, VA 20166
December 17, 2025

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1. CONCLUSIONS

An interference study considering all existing, proposed and prior coordinated microwave facilities within the coordination contours of the proposed earth station demonstrates that this site will operate satisfactorily with the common carrier microwave environment. Further, there will be no restrictions of its operation due to interference considerations.

2. SUMMARY OF RESULTS

A number of great circle interference cases were identified during the interference study of the proposed earth station. Each of the cases, which exceeded the interference objective on a line-of-sight basis, was profiled and the propagation losses estimated using NBS TN101 (Revised) techniques. The losses were found to be sufficient to reduce the signal levels to acceptable magnitudes in every case.

3. SUPPLEMENTAL SHOWING

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations.

Coordination data for this earth station was sent to the below listed carriers with a letter dated 11/19/2025.

Company

AMA Communications, LLC
AMG Technology Investment Group LLC
BASA Resources, Inc.
BPX Production Company
Business Only Broadband, LLC
Cellco Partnership-AZ/NM/NV
Cellco Partnership-C TX/LA/AR/OK
Citation Oil & Gas Corp.
City of Carlsbad
City of Midland, Texas
ConocoPhillips Communications Inc.
Conterra Ultra Broadband, LLC
Dell Telephone Cooperative, Inc.
Dellcom, Inc.
Ector County
Enterprise Products Operating, LLC
ExxonMobil
Flat Wireless, LLC
Hilcorp Energy Company
Lea County Electric Cooperative Inc.
Leaco Rural Telephone Cooperative
Lubbock Emergency Communication District
Lubbock, City of
Midland County
NetWest Online Inc.
Occidental Petroleum Corporation
Odessa, City of
Olympic Wireless, LLC
Plainview Independent School District
Plateau Telecommunications, Inc.
Prospero Energy Project, LLC
Quik Net
RB3, LLC
Resound Networks
Rhino Communications, Inc
South Plains College
Southwestern Wireless
T-Mobile MW LLC
Targa Midstream Services LLC
TeleSpan, Inc.

Texas New Mexico Power Company
TransWorld Network, LLC
U.S. Energy Development Corporation
Upstream Investments, LLC
WES Operating Holdco LLC
WaveDirect Telecommunications
Wes-Tex Telephone Cooperative, Inc.
Zion Broadband, Inc.

4. EARTH STATION COORDINATION DATA

This section presents the data pertinent to frequency coordination of the proposed earth station that was circulated to all carriers within its coordination contours.

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Date: 12/17/2025
Job Number: 251119COMSGE03

Administrative Information

Status: ENGINEER PROPOSAL
Call Sign:
Licensee Code: KUIPER
Licensee Name: Kuiper Systems LLC

Site Information

SEMINOLE, TX

Venue Name:
Latitude (NAD 83): 32° 54' 2.4" N
Longitude (NAD 83): 103° 0' 52.5" W
Climate Zone: A
Rain Zone: 5
Ground Elevation (AMSL): 1107.11 m / 3632.3 ft

Link Information

Satellite Type: Low Earth Orbit
Mode: TR - Transmit-Receive
Modulation: Digital
Minimum Elevation Angle: 20.0°
Azimuth Range: 0.0° to 360°
Antenna Centerline (AGL): 2.74 m / 9.0 ft

Antenna Information

Receive - FCC32

Transmit - FCC32

Manufacturer	Kuiper	Kuiper
Model	Model 24001	Model 24001
Gain / Diameter	49.0 dBi / 2.4 m	53.8 dBi / 2.4 m
3-dB / 15-dB Beamwidth	0.77° / 1.70°	0.49° / 1.17°
Max Available RF Power (dBW/4 kHz)		-41.0
	(dBW/MHz)	-17.0
Maximum EIRP (dBW/4 kHz)		12.8
	(dBW/MHz)	36.8
Interference Objectives:	Long Term	-156.0 dBW/MHz 20%
	Short Term	-146.0 dBW/MHz 0.01%
		-151.0 dBW/4 kHz 20%
		-128.0 dBW/4 kHz 0.0025%

Frequency Information

Receive 18.0 GHz

Transmit 28.0 GHz

Emission / Frequency Range (MHz)	50M0G7D - 500MG7D / 17800.0 - 18600.0 50M0G7D - 500MG7D / 18800.0 - 20200.0	50M0G7D - 500MG7D / 27500.0 - 30000.0
Max Great Circle Coordination Distance	247.0 km / 153.5 mi	25.0 km / 15.5 mi
Precipitation Scatter Contour Radius	100.0 km / 62.1 mi	100.0 km / 62.1 mi

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Coordination Values

SEMINOLE, TX

Licensee Name	Kuiper Systems LLC				
Latitude (NAD 83)	32° 54' 2.4" N				
Longitude (NAD 83)	103° 0' 52.5" W				
Ground Elevation (AMSL)	1107.11 m / 3632.3 ft				
Antenna Centerline (AGL)	2.74 m / 9.0 ft				
Antenna Model	Kuiper 2.4 meter				
Antenna Mode	Receive 18.0 GHz		Transmit 28.0 GHz		
Interference Objectives: Long Term	-156.0 dBW/MHz	20%	-151.0 dBW/4 kHz	20%	
Short Term	-146.0 dBW/MHz	0.01%	-128.0 dBW/4 kHz	0.0025%	
Max Available RF Power			-41.0 (dBW/4 kHz)		

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Receive 18.0 GHz		Transmit 28.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)	Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	83.24	-0.50	247.00	-0.50	25.00
5	0.00	78.53	-0.50	247.00	-0.50	25.00
10	0.00	73.82	-0.50	247.00	-0.50	25.00
15	0.00	69.13	-0.50	247.00	-0.50	25.00
20	0.00	64.46	-0.50	247.00	-0.50	25.00
25	0.00	59.81	-0.50	247.00	-0.50	25.00
30	0.00	55.20	-0.50	247.00	-0.50	25.00
35	0.00	50.65	-0.50	247.00	-0.50	25.00
40	0.00	46.15	-0.50	247.00	-0.50	25.00
45	0.00	41.74	-0.50	247.00	-0.50	25.00
50	0.00	37.46	-0.50	247.00	-0.50	25.00
55	0.00	33.34	-0.50	247.00	-0.50	25.00
60	0.00	29.46	-0.50	247.00	-0.50	25.00
65	0.00	25.92	-0.50	247.00	-0.50	25.00
70	0.00	22.90	-0.50	247.00	-0.50	25.00
75	0.00	20.61	-0.50	247.00	-0.50	25.00
80	0.00	19.32	-0.50	247.00	-0.50	25.00
85	0.00	19.23	-0.50	247.00	-0.50	25.00
90	0.00	20.36	-0.50	247.00	-0.50	25.00
95	0.00	22.53	-0.50	247.00	-0.50	25.00
100	0.00	25.47	-0.50	247.00	-0.50	25.00
105	0.00	28.94	-0.50	247.00	-0.50	25.00
110	0.00	32.78	-0.50	247.00	-0.50	25.00
115	0.00	36.88	-0.50	247.00	-0.50	25.00
120	0.00	41.14	-0.50	247.00	-0.50	25.00
125	0.00	45.54	-0.50	247.00	-0.50	25.00
130	0.00	50.02	-0.50	247.00	-0.50	25.00
135	0.00	54.57	-0.50	247.00	-0.50	25.00
140	0.00	59.17	-0.50	247.00	-0.50	25.00
145	0.00	63.81	-0.50	247.00	-0.50	25.00
150	0.00	68.48	-0.50	247.00	-0.50	25.00
155	0.00	73.17	-0.50	247.00	-0.50	25.00
160	0.00	77.87	-0.50	247.00	-0.50	25.00
165	0.00	82.59	-0.50	247.00	-0.50	25.00
170	0.00	87.31	-0.50	247.00	-0.50	25.00
175	0.00	92.03	-0.50	247.00	-0.50	25.00
180	0.21	96.75	-0.50	247.00	-0.50	25.00
185	0.24	101.46	-0.50	247.00	-0.50	25.00

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Coordination Values

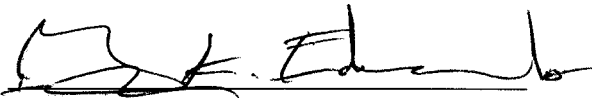
SEMINOLE, TX

Licensee Name	Kuiper Systems LLC				
Latitude (NAD 83)	32° 54' 2.4" N				
Longitude (NAD 83)	103° 0' 52.5" W				
Ground Elevation (AMSL)	1107.11 m / 3632.3 ft				
Antenna Centerline (AGL)	2.74 m / 9.0 ft				
Antenna Model	Kuiper 2.4 meter				
Antenna Mode	Receive 18.0 GHz		Transmit 28.0 GHz		
Interference Objectives: Long Term	-156.0 dBW/MHz	20%	-151.0 dBW/4 kHz	20%	
Short Term	-146.0 dBW/MHz	0.01%	-128.0 dBW/4 kHz	0.0025%	
Max Available RF Power			-41.0 (dBW/4 kHz)		

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Receive 18.0 GHz		Transmit 28.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)	Horizon Gain (dBi)	Coordination Distance (km)
190	0.27	106.15	-0.50	247.00	-0.50	25.00
195	0.28	110.84	-0.50	247.00	-0.50	25.00
200	0.28	115.50	-0.50	247.00	-0.50	25.00
205	0.29	120.13	-0.50	247.00	-0.50	25.00
210	0.28	124.73	-0.50	247.00	-0.50	25.00
215	0.26	129.28	-0.50	247.00	-0.50	25.00
220	0.24	133.77	-0.50	247.00	-0.50	25.00
225	0.21	138.17	-0.50	247.00	-0.50	25.00
230	0.00	142.54	-0.50	247.00	-0.50	25.00
235	0.00	146.66	-0.50	247.00	-0.50	25.00
240	0.00	150.54	-0.50	247.00	-0.50	25.00
245	0.00	154.08	-0.50	247.00	-0.50	25.00
250	0.00	157.10	-0.50	247.00	-0.50	25.00
255	0.00	159.39	-0.50	247.00	-0.50	25.00
260	0.00	160.68	-0.50	247.00	-0.50	25.00
265	0.00	160.77	-0.50	247.00	-0.50	25.00
270	0.00	159.64	-0.50	247.00	-0.50	25.00
275	0.00	157.47	-0.50	247.00	-0.50	25.00
280	0.00	154.53	-0.50	247.00	-0.50	25.00
285	0.00	151.06	-0.50	247.00	-0.50	25.00
290	0.00	147.22	-0.50	247.00	-0.50	25.00
295	0.00	143.12	-0.50	247.00	-0.50	25.00
300	0.00	138.86	-0.50	247.00	-0.50	25.00
305	0.00	134.46	-0.50	247.00	-0.50	25.00
310	0.00	129.98	-0.50	247.00	-0.50	25.00
315	0.00	125.43	-0.50	247.00	-0.50	25.00
320	0.00	120.83	-0.50	247.00	-0.50	25.00
325	0.00	116.19	-0.50	247.00	-0.50	25.00
330	0.00	111.52	-0.50	247.00	-0.50	25.00
335	0.00	106.83	-0.50	247.00	-0.50	25.00
340	0.00	102.13	-0.50	247.00	-0.50	25.00
345	0.00	97.41	-0.50	247.00	-0.50	25.00
350	0.00	92.69	-0.50	247.00	-0.50	25.00
355	0.00	87.97	-0.50	247.00	-0.50	25.00

5. CERTIFICATION

I HEREBY CERTIFY THAT I AM THE TECHNICALLY QUALIFIED PERSON RESPONSIBLE FOR THE PREPARATION OF THE FREQUENCY COORDINATION DATA CONTAINED IN THIS APPLICATION, THAT I AM FAMILIAR WITH PARTS 101 AND 25 OF THE FCC RULES AND REGULATIONS, THAT I HAVE EITHER PREPARED OR REVIEWED THE FREQUENCY COORDINATION DATA SUBMITTED WITH THIS APPLICATION, AND THAT IT IS COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

BY: _____

Gary K. Edwards
Senior Manager
COMSEARCH
21515 Ridgetop Circle, Suite 300
Sterling, VA 20166

DATED: December 17, 2025

Ka-Band Earth Station – Seminole, TX

Frequency Coordination Report

28 GHz



Prepared on Behalf of
KUIPER SYSTEMS, LLC

December 17, 2025

 **comsearch**[®]
an ANDREW company

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1. Summary of Results

On behalf of KUIPER SYSTEMS, LLC, Comsearch performed a coordination notice under Section 25.203(c) and Section 25.136(a)(4) of the FCC's rules for all existing and proposed terrestrial licenses within the coordination contours of their proposed Ka-Band earth station in Seminole, TX, which will transmit at 28 GHz¹. Prior-notification letters were sent to the licensees and a copy of the notification data is provided in section four of this report. The earth station coordination was finalized on December 17, 2025.

There were no objections from any of the incumbent 28 GHz licensees.

2. 28 GHz Common Carrier and LMDS Coordination

In accordance with FCC Rules and Regulations, the Ka-Band earth station in Seminole, TX was prior-coordinated by Comsearch. A notification letter and datasheets for this earth station were sent to the following 28 GHz common carrier fixed microwave licensees. These licensees are authorized to operate temporary fixed operations from 27.5 – 29.5 GHz on a nationwide basis or local basis.

Licensee	Authorized Geographic Area
None Identified	

A notification letter and datasheets for the Ka-Band earth station in Seminole, TX were also sent to the following 28 GHz local multipoint distribution system (LMDS) licensees. These licensees are authorized to operate fixed operations from 29.1 – 29.25 GHz on a market basis.

Licensee	Authorized Geographic Area
Plateau	Market Based

No objections were received from the common carrier or LMDS incumbents.

¹ The proposed earth station will operate in the 27.5 – 30.0 GHz portion of the Ka-Band.

3. 28 GHz UMFUS Coordination

There were three 28 GHz UMFUS licensees identified within the coordination distance of the proposed earth station. The proposed earth station will operate on frequencies that overlap Channel L1 & L2 of the UMFUS service. The total frequency allocation for Channels L1 & L2 of the UMFUS spectrum appears below.

Channel: **L1** 27.500 - 27.925 GHz
 L2 27.925 - 28.350 GHz

Licensee	Authorized Geographic Area
Plateau	Market Based
Verizon	Market Based
Windstream	Market Based

There were no objections from the UMFUS incumbents within coordination distance.

4. Earth Station Coordination Data

This section presents the data pertinent to the proposed Ka-Band earth station in Seminole, TX. This data was circulated to all incumbent licensees in the shared 28 GHz frequency ranges.

Job Number: 251119COMSGE03

Administrative Information

Status ENGINEER PROPOSAL
 Call Sign
 Licensee Code KUIPER
 Licensee Name Kuiper Systems LLC

Site Information

SEMINOLE, TX

Venue Name
 Latitude (NAD 83) 32° 54' 2.4" N
 Longitude (NAD 83) 103° 0' 52.5" W
 Climate Zone A
 Rain Zone 5
 Ground Elevation (AMSL) 1107.11 m / 3632.3 ft

Link Information

Satellite Type Low Earth Orbit
 Mode TR - Transmit-Receive
 Modulation Digital
 Minimum Elevation Angle 20.0°
 Azimuth Range 0.0° to 360°
 Antenna Centerline (AGL) 2.74 m / 9.0 ft

Antenna Information

Receive - FCC32

Transmit - FCC32

Manufacturer Kuiper
 Model Model 24001
 Gain / Diameter 49.0 dBi / 2.4 m
 3-dB / 15-dB Beamwidth 0.77° / 1.70°

Kuiper
 Model 24001
 53.8 dBi / 2.4 m
 0.49° / 1.17°

Max Available RF Power (dBW/4 kHz)
 (dBW/MHz)

-41.0
 -17.0

Maximum EIRP (dBW/4 kHz)
 (dBW/MHz)

12.8
 36.8

Interference Objectives: Long Term -156.0 dBW/MHz 20%
 Short Term -146.0 dBW/MHz 0.01%

-151.0 dBW/4 kHz 20%
 -128.0 dBW/4 kHz 0.0025%

Frequency Information

Receive 18.0 GHz

Transmit 28.0 GHz

Emission / Frequency Range (MHz) 50M0G7D - 500MG7D / 17800.0 - 18600.0
 50M0G7D - 500MG7D / 18800.0 - 20200.0

50M0G7D - 500MG7D / 27500.0 - 30000.0

Max Great Circle Coordination Distance 247.0 km / 153.5 mi
 Precipitation Scatter Contour Radius 100.0 km / 62.1 mi

25.0 km / 15.5 mi
 100.0 km / 62.1 mi

Coordination Values		SEMINOLE, TX				
Licensee Name		Kuiper Systems LLC				
Latitude (NAD 83)		32° 54' 2.4" N				
Longitude (NAD 83)		103° 0' 52.5" W				
Ground Elevation (AMSL)		1107.11 m / 3632.3 ft				
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Antenna Model		Kuiper 2.4 meter				
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Interference Objectives:		Long Term	-156.0 dBW/MHz	20%	-151.0 dBW/4 kHz	20%
		Short Term	-146.0 dBW/MHz	0.01%	-128.0 dBW/4 kHz	0.0025%
Max Available RF Power		-41.0 (dBW/4 kHz)				
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Receive 18.0 GHz		Transmit 28.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)	Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	83.24	-0.50	247.00	-0.50	25.00
5	0.00	78.53	-0.50	247.00	-0.50	25.00
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15	0.00	69.13	-0.50	247.00	-0.50	25.00
20	0.00	64.46	-0.50	247.00	-0.50	25.00
25	0.00	59.81	-0.50	247.00	-0.50	25.00
30	0.00	55.20	-0.50	247.00	-0.50	25.00
35	0.00	50.65	-0.50	247.00	-0.50	25.00
40	0.00	46.15	-0.50	247.00	-0.50	25.00
45	0.00	41.74	-0.50	247.00	-0.50	25.00
50	0.00	37.46	-0.50	247.00	-0.50	25.00
55	0.00	33.34	-0.50	247.00	-0.50	25.00
60	0.00	29.46	-0.50	247.00	-0.50	25.00
65	0.00	25.92	-0.50	247.00	-0.50	25.00
70	0.00	22.90	-0.50	247.00	-0.50	25.00
75	0.00	20.61	-0.50	247.00	-0.50	25.00
80	0.00	19.32	-0.50	247.00	-0.50	25.00
85	0.00	19.23	-0.50	247.00	-0.50	25.00
90	0.00	20.36	-0.50	247.00	-0.50	25.00
95	0.00	22.53	-0.50	247.00	-0.50	25.00
100	0.00	25.47	-0.50	247.00	-0.50	25.00
105	0.00	28.94	-0.50	247.00	-0.50	25.00
110	0.00	32.78	-0.50	247.00	-0.50	25.00
115	0.00	36.88	-0.50	247.00	-0.50	25.00
120	0.00	41.14	-0.50	247.00	-0.50	25.00
125	0.00	45.54	-0.50	247.00	-0.50	25.00
130	0.00	50.02	-0.50	247.00	-0.50	25.00
135	0.00	54.57	-0.50	247.00	-0.50	25.00
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170	0.00	87.31	-0.50	247.00	-0.50	25.00
175	0.00	92.03	-0.50	247.00	-0.50	25.00
180	0.21	96.75	-0.50	247.00	-0.50	25.00
185	0.24	101.46	-0.50	247.00	-0.50	25.00

Coordination Values		SEMINOLE, TX				
Licensee Name		Kuiper Systems LLC				
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Antenna Model		Kuiper 2.4 meter				
Antenna Mode		Receive 18.0 GHz		Transmit 28.0 GHz		
Interference Objectives:	Long Term	-156.0 dBW/MHz	20%	-151.0 dBW/4 kHz	20%	
	Short Term	-146.0 dBW/MHz	0.01%	-128.0 dBW/4 kHz	0.0025%	
Max Available RF Power		-41.0 (dBW/4 kHz)				
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Receive 18.0 GHz		Transmit 28.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)	Horizon Gain (dBi)	Coordination Distance (km)
190	0.27	106.15	-0.50	247.00	-0.50	25.00
195	0.28	110.84	-0.50	247.00	-0.50	25.00
200	0.28	115.50	-0.50	247.00	-0.50	25.00
205	0.29	120.13	-0.50	247.00	-0.50	25.00
210	0.28	124.73	-0.50	247.00	-0.50	25.00
215	0.26	129.28	-0.50	247.00	-0.50	25.00
220	0.24	133.77	-0.50	247.00	-0.50	25.00
225	0.21	138.17	-0.50	247.00	-0.50	25.00
230	0.00	142.54	-0.50	247.00	-0.50	25.00
235	0.00	146.66	-0.50	247.00	-0.50	25.00
240	0.00	150.54	-0.50	247.00	-0.50	25.00
245	0.00	154.08	-0.50	247.00	-0.50	25.00
250	0.00	157.10	-0.50	247.00	-0.50	25.00
255	0.00	159.39	-0.50	247.00	-0.50	25.00
260	0.00	160.68	-0.50	247.00	-0.50	25.00
265	0.00	160.77	-0.50	247.00	-0.50	25.00
270	0.00	159.64	-0.50	247.00	-0.50	25.00
275	0.00	157.47	-0.50	247.00	-0.50	25.00
280	0.00	154.53	-0.50	247.00	-0.50	25.00
285	0.00	151.06	-0.50	247.00	-0.50	25.00
290	0.00	147.22	-0.50	247.00	-0.50	25.00
295	0.00	143.12	-0.50	247.00	-0.50	25.00
300	0.00	138.86	-0.50	247.00	-0.50	25.00
305	0.00	134.46	-0.50	247.00	-0.50	25.00
310	0.00	129.98	-0.50	247.00	-0.50	25.00
315	0.00	125.43	-0.50	247.00	-0.50	25.00
320	0.00	120.83	-0.50	247.00	-0.50	25.00
325	0.00	116.19	-0.50	247.00	-0.50	25.00
330	0.00	111.52	-0.50	247.00	-0.50	25.00
335	0.00	106.83	-0.50	247.00	-0.50	25.00
340	0.00	102.13	-0.50	247.00	-0.50	25.00
345	0.00	97.41	-0.50	247.00	-0.50	25.00
350	0.00	92.69	-0.50	247.00	-0.50	25.00
355	0.00	87.97	-0.50	247.00	-0.50	25.00

5. Contact Information

For questions or information regarding the 28 GHz Frequency Coordination Report, please contact:

Contact person:	Gary Edwards
Title:	Senior Manager, Satellite Services
Company:	Comsearch
Address:	21515 Ridgetop Circle, Suite 300, Sterling, VA 20166
Telephone:	703-726-5662
Fax:	703-726-5599
Email:	GEdwards@Comsearch.com
Web site:	www.comsearch.com

EXHIBIT B

RADIATION HAZARD ANALYSIS

Introduction

In accordance with OET Bulletin 65,¹ this Radiation Hazard Analysis demonstrates that the Amazon 2.4m gateway antennas comply with Commission limits for human exposure to radiofrequency (“RF”).

OET Bulletin 65 and Section 1.1310 of the Commission’s rules specify two separate tiers of maximum permissible exposure (“MPE”).² The occupational/controlled MPE limit is 5 milliwatts per centimeter squared averaged over any six minute period.³ The general population/uncontrolled MPE limit is 1 milliwatt per centimeter squared averaged over any thirty minute period.⁴

Amazon calculated the (i) power over the sub-reflector and antenna surface and (ii) near-field and far-field power density for the main and off-axis beams and confirms compliance with both MPE tiers’ limits for all regions.

- ***Occupational/controlled exposure.*** This population will not experience harmful radiation levels, as determined by the Commission. A combination of mitigating measures ensures this: (1) only trained personnel will enter the locked area surrounding the antennas, (2) any individual antenna requiring hands-on maintenance will have its transmit function turned off before scheduled maintenance events, (3) the antennas will not transmit at elevation angles lower than 20°, and (4) trained personnel will maintain a minimum distance from transmitting antenna apertures to prevent main-beam exposure. Due to the antenna minimum elevation angles, direct main-beam exposure cannot occur unless a person is within a small radius around each antenna. Trained personnel inside the locked area may be in proximity of an antenna’s main-beam for a short duration, but will generally only be exposed to a near-field, off-axis exposure for which the power density is far below the occupational/controlled MPE limits. The results below demonstrate that trained personnel can safely go into the secure area, approach an actively transmitting antenna, and disable the antenna transmission without being exposed to levels above the occupational/controlled MPE limits in a six minute averaging window.
- ***General population/uncontrolled exposure.*** This population will not experience harmful radiation levels, as determined by the Commission. The results for the worst-case scenario (near-field, off-axis power density) support this conclusion. Furthermore, gateways will be deployed in occupational/controlled exposure environments within access-controlled, locked facilities and will be inaccessible to the general population.

¹ See FCC OET Bulletin 65, Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields (Aug. 1997) (“OET Bulletin 65”). Amazon is aware of and will comply with the recently modified rules for radiofrequency exposure that are relevant to fixed earth stations. See generally *Proposed Changes in the Commission’s Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields et al.*, Second Report and Order et al., 34 FCC Rcd 11687 (2019).

² See 47 C.F.R. § 1.1310.

³ See OET Bulletin 65 at Appendix A, Table 1(A).

⁴ See *id.* at Appendix A, Table 1(B).

Input Parameters

Input Parameter	Unit	Value
Aperture Diameter	meters	2.4
Aperture Radius	meters	1.20
Sub-reflector Diameter	meters	0.408
Sub-reflector Radius	meters	0.204
Aperture Efficiency	Percentage	61%
Frequency	MHz	28750.00
Antenna Gain	dBi	53.8
Total Transmitter Power	W	100
Minimum Elevation Angle	degrees	20.00

Calculations

Calculated Variables	Unit	Value	Variable	OET Ref
Wavelength	meters	0.01	$\lambda = \frac{c}{f}$	
Area of Reflector	meters ²	4.52	$A = \pi r^2$	
Area of Sub-reflector	meters ²	0.1307	$A_{sub} = \pi r^2$	
Near-Field Distance	meters	138.10	$R_{nf} = \frac{D^2}{4\lambda}$	(12)
Far-Field Distance	meters	331.43	$R_{ff} = \frac{0.6D^2}{\lambda}$	(16)
Far-Field Off-Axis Gain	dBi	-0.53	$G_{ff(dBi)}$ $= 32 - 25\log_{10}(\theta)$ $\theta = \text{min elevation}$ $= 20^\circ$	
Far-Field Off-Axis Gain		0.89	$G_{ff} = 10^{\left(\frac{G_{ff(dBi)}}{10}\right)}$	
Power over Sub-reflector	mW/cm ²	305.95	$S_{surface} = \frac{4P}{A_{sub}}$	(11)
Power over Antenna Surface	mW/cm ²	8.84	$S_{surface} = \frac{4P}{A}$	(11)
Near-Field Power Density (Main Beam)	mW/cm ²	14.49	$S_{nf} = \frac{16P}{\eta\pi D^2}$	(13) ⁵
Near-Field Power Density (Off-Axis)	mW/cm ²	0.145	$S_{nf} = \frac{16P}{100\eta\pi D^2}$	(13) ⁶
Far-Field Max Power Density (Main Beam)	mW/cm ²	1.73	$S_{ff} = \frac{PG}{4\pi R^2}$	(18)
Far-Field Max Power Density (Off-Axis)	mW/cm ²	0.000006	$S_{ff off-axis} = \frac{PG_{ff}}{4\pi R^2}$	(18) ⁷

⁵ Per the OET guidance, this formula was updated to include the efficiency term (η) in the denominator instead of the numerator to reflect the OET's recent standards (e.g., IEEE Std. C95.3-2021)

⁶ See *id.* at 30 (“For off-axis calculations in the near-field and in the transition region it can be assumed that, if the point of interest is at least one antenna diameter removed from the center of the main beam, the power density at that point would be at least a factor of 100 (20 dB) less than the value calculated for the equivalent distance in the main beam see Reference [15]).”).

⁷ See *id.* (“For practical estimation of RF fields in the off-axis vicinity of aperture antennas, use of the antenna radiation pattern envelope can be useful. For example, for the case of an earth station in the fixed-satellite service, the Commission’s Rules specify maximum allowable gain for antenna sidelobes not within the plane of the geostationary satellite orbit, such as at ground level. . . . Use of the gain obtained from these relationships in simple far-field calculations, such as Equation 18, will generally be sufficient for estimating RF field levels in the surrounding environment, since the apparent aperture of the antenna is typically very small compared to its frontal area.”).

Additional Safety Measures

Access to Amazon's antennas will be carefully controlled. The antennas will be enclosed by a 3m tall fence with locked gates. There will be clear and visible signage that will warn individuals of potential RF exposure risk. Each antenna will have an emergency stop switch that is to be engaged whenever personnel are working on or close to the antenna. The emergency stop switch will disable all RF transmissions from the antenna. All pedestrian gates shall be fully access controlled. Emergency or delivery gates shall be secured with a lock and monitored. Additionally, the transmitter will be turned off during maintenance activities.

Results

In a controlled area accessible to the occupational population, the peak near-field power density will be 14.49 mW/cm² and the off-axis near-field power density will be 0.145 mW/cm². As stated in further detail above, Amazon will ensure proper mitigations are in place to limit the average power density levels in all scenarios such that they do not exceed the MPE limit of 5 mW/cm² averaged over a period of six minutes.

In an uncontrolled area accessible to the general population, the off-axis near-field power density (0.145 mW/cm²) and off-axis far-field power density (0.000006 mW/cm²) levels are below the MPE limit of 1 mW/cm² averaged over a period of thirty minutes.⁸

This Radiation Hazard Analysis demonstrates that harmful levels of radiation will not occur in the regions accessible by both the occupational and general populations.

⁸ The minimum elevation angle of 20 degrees mostly prohibits the potential for the general population to be affected by the peak power density levels. Additionally, the constant repositioning of the antennas as they track Kuiper System low-earth orbit satellites also ensures that the average power density levels will be significantly reduced when averaged over any six-minute period.

EXHIBIT C ANTENNA PATTERN

2.4m Antenna Pattern
Frequency: 27500 MHz (CoPol)
Gain: 53.8 dBi

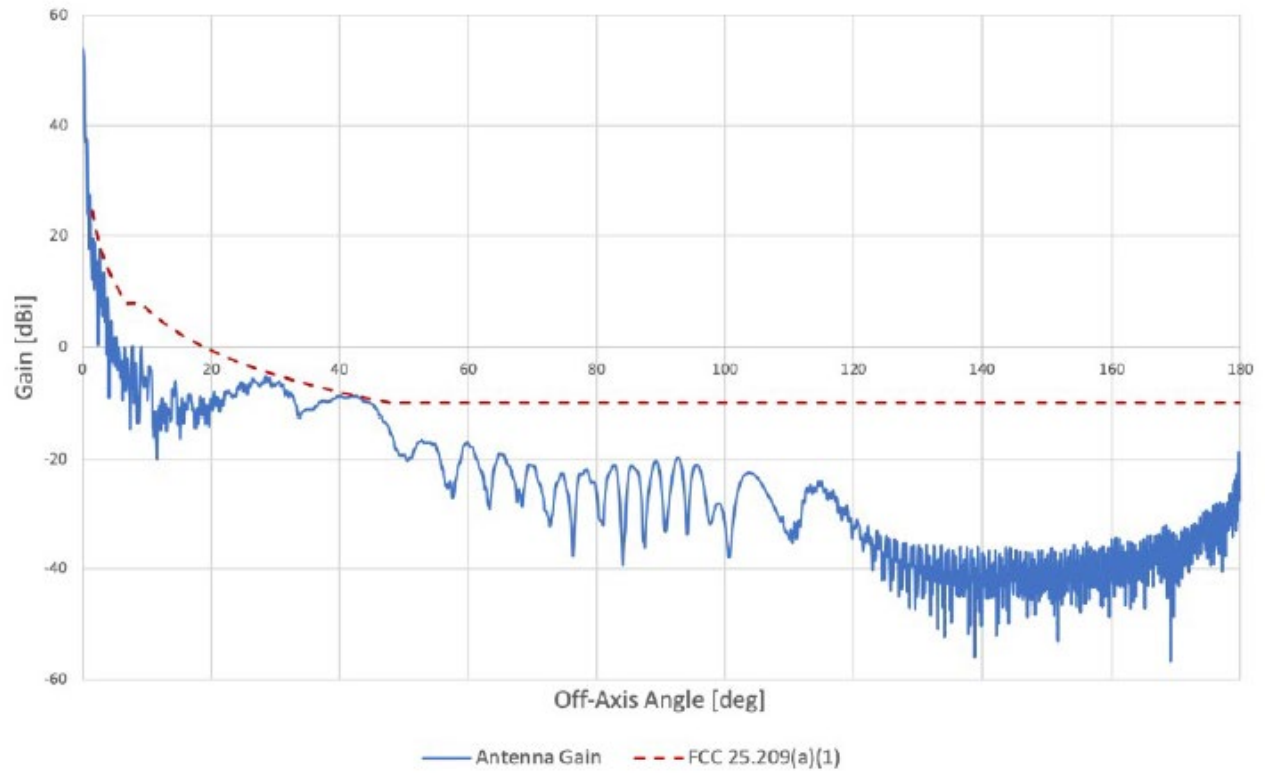


EXHIBIT D UPPER MICROWAVE FLEXIBLE USE SERVICE ANALYSIS

This Exhibit D demonstrates that the proposed gateway earth station¹ satisfactorily protects 27.5-28.35 GHz Upper Microwave Flexible Use Service (“UMFUS”) deployments in Gaines County, TX (“County”).

Section 25.136(a)(4) of the Commission’s rules outlines how Fixed-Satellite Service (“FSS”) operators may deploy gateways in the 27.5-28.35 GHz band without providing additional interference protection to co-frequency UMFUS licensees.² *First*, one U.S. county may not possess more than three co-frequency FSS earth stations operating in the 27.5-28.35 GHz band.³ *Second*, the area in which the earth station generates a power flux-density (“PFD”) greater than or equal to -77.6 dBm/m²/MHz at 10 meters above ground level (“-77.6 dBm/m²/MHz”), together with the similar area of any other gateway authorized under section 25.136(a)(1)-(4), may not cover more than certain population amounts.⁴ *Third*, the -77.6 dBm/m²/MHz PFD contour may not contain any major event venue, urban mass transit route, passenger railroad, cruise ship port, or certain types of roads (Interstate, Other Freeways and Expressways, or Other Principal Arterial).⁵ *Fourth*, the FSS operator must have coordinated with existing UMFUS licensees located within a PFD contour greater than or

¹ In this document, earth stations are also referenced as gateways.

² See 47 C.F.R. § 25.136(a)(4). The Commission has offered additional guidance on how to present section 25.136 showings. See generally *International Bureau Issues Guidance on Siting Methodologies for Earth Stations Seeking to Operate in the 24.75-25.25 GHz, 27.5-28.35 GHz, 37.5-40 GHz, 47.2-48.2 GHz, and 50.4-51.4 GHz Frequency Bands to Demonstrate Compliance with Section 25.136*, Public Notice, 35 FCC Rcd 6347 (IB 2020) (“Guidance”).

³ See 47 C.F.R. § 25.136(a)(4)(i).

⁴ See 47 C.F.R. § 25.136(a)(4)(ii); *id.* at Table 2 to Paragraph (a)(4)(ii) (permitting the PFD contour to cover 0.1 percent of the population in a county with more than 450,000 people; 450 people in a county with 6,000-450,000 people; and 7.5 percent of the population in a county with fewer than 6,000 people).

⁵ See 47 C.F.R. § 25.136(a)(4)(iii). See also *In the Matter of Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, Second Report and Order, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, and Memorandum Opinion and Order, 32 FCC Rcd 10988, 11031-32, 11085-86 ¶ 131, Appendix B (2017).

equal to -77.6 dBm/m²/MHz at 10 meters above ground level pursuant to section 101.103(d) of the Commission's rules.⁶

Amazon's analysis shows compliance with section 25.136(a)(4) and the Guidance. No more than three FSS earth stations will operate under the provisions of section 25.136(a) in the County hosting the proposed gateway. Amazon's -77.6 dBm/m²/MHz PFD contour covers 107 people of the County's total population of 21,598. The PFD contour does not contain any major event venue, urban mass transit route, passenger railroad, cruise ship port, Interstate, Other Freeways and Expressways, or Other Principal Arterial. Amazon has also completed coordination with existing UMFUS licensees, as required.⁷ Accordingly, the Commission should grant this application; no additional interference protection beyond these existing safeguards to UMFUS licensees in the County is required.

Section 25.136(a)(4)(i) (no more than three co-frequency FSS gateways in one county)

Section 25.136(a)(4)(i) of the Commission's rules requires the applicant to demonstrate that "[t]here are no more than two other authorized earth stations operating in the 27.5-28.35 GHz band within the county where the proposed earth station is located that meet the criteria contained in either paragraph (a)(1), (2), (3), or (4) of this section."⁸ For purposes of this rule, "multiple earth stations that are collocated with or at a location contiguous to each other shall be considered as one earth station."⁹

Figure 1 depicts the proposed earth station's location in the County. The earth station location is denoted by a star, Gaines County is shown in yellow, and the earth station contour is in green.

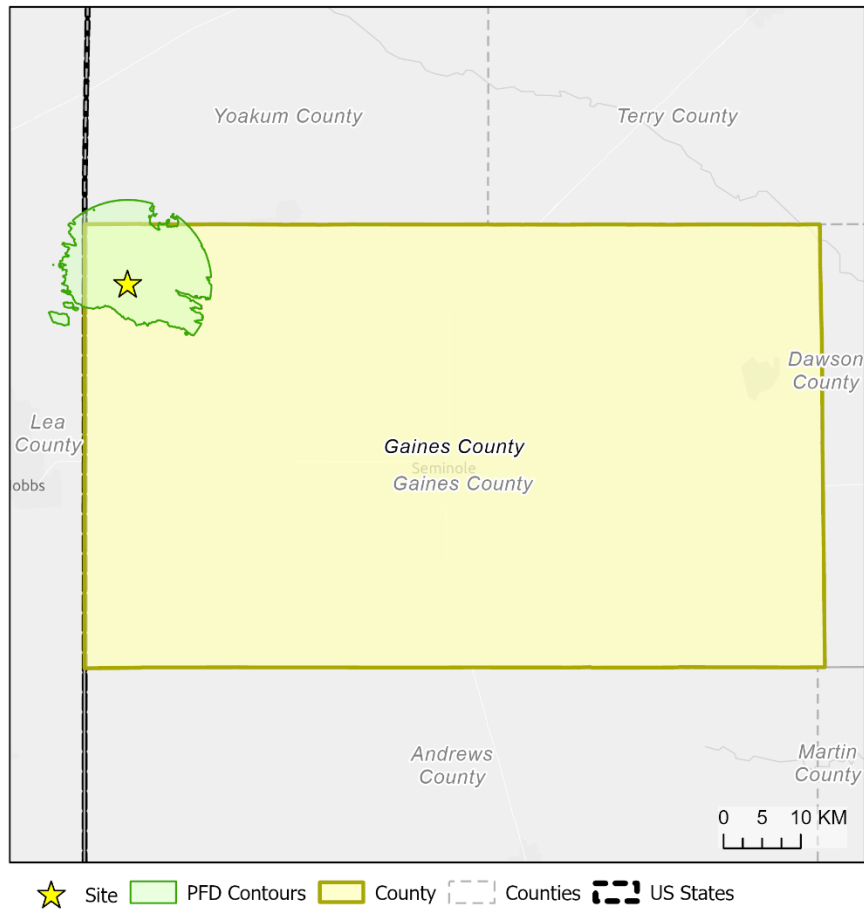
⁶ See 47 C.F.R. § 25.136(a)(4)(iv).

⁷ See Exhibit A, Comsearch Report.

⁸ 47 C.F.R. § 25.136(a)(4)(i).

⁹ *Id.*

Figure 1. Location of Amazon Earth Station



As of the date of this submission, the Commission’s International Communications Filing System shows no other FSS earth station license application using the 27.5-28.35 GHz band in the County.¹⁰ As there are no more than two other authorized earth stations operating in the 27.5-28.35 GHz band within the County, this gateway application complies with section 25.136(a)(4)(i).

PFD Contour Generation –Sections 25.136(a)(4)(ii)–(iv)

To verify compliance with sections 25.136(a)(4)(ii)-(iv), Amazon generated the gateway’s - 77.6 dBm/m²/MHz PFD contour as shown in Figure 2. The gateway’s maximum aggregate equivalent

¹⁰ See *International Communications Filing System*, FCC, <http://licensing.fcc.gov/myibfs> (last visited Jul. 22, 2026).

isotropic radiated power (“EIRP”) from its four active antennas will be -19 dBW/MHz at the horizon in any azimuth direction based on a simulated antenna pattern.¹¹

Table 1. Amazon Earth Station Parameters

Field	Value	Units
County	Gaines County, TX	
Latitude	32° 54' 2.4" N	
Longitude	103° 0' 52.5" W	
Simulation Frequency	27.5	GHz
Number of Active Antennas	4	
Antenna Centerline Height (Above Ground Level)	1.9 - 2.74, depending on azimuth and elevation ¹²	meters
Worst-case Antenna Gain toward the Horizon	-5.0	dBi
Average Gain toward the Horizon	-10.0	dBi
RF Transmit Power	-17.0	dBW/MHz
Aggregate EIRP toward the Horizon ¹³	-19.0	dBW/MHz

Amazon generated the proposed earth station’s -77.6 dBm/m²/MHz PFD contour using internal satellite communications and geospatial analysis software that has had its validity verified using Visualyse Pro. The PFD contours were generated by creating a raster grid of measurement points located 10 meters above ground level and surrounding the earth station, and calculating the path attenuation, received power and power flux-density to each point. To assess radio propagation, Amazon used ITU-R Recommendation P.452 and National Aeronautics and Space Administration

¹¹ The gateway will have six antennas, but no more than four antennas will transmit on the same channel at any given time. The extra antennas will be used to reduce downtime by being passively pre-positioned to begin communicating with a rising satellite immediately after an active satellite sets. The extra antennas will also be used to ensure earth station availability in the event of an antenna failure.

¹² The Amazon antennas will use X/Y mounts. The height of the center of radiation of the antenna will vary depending on the azimuth and elevation of the antenna. At minimum elevation, the height will be under 2.5 meters in all azimuth directions.

¹³ This figure is based on three of the four active antennas operating at average off-axis gain in the direction of an UMFUS receiver 10 meters above ground level (-10 dBi) and one of the four active antennas operating at the worst case off-axis gain in the direction of an UMFUS receiver 10 meters above ground level (-5.0 dBi).

Shuttle Radar Topography Mission digital topology data, which employs a 3-arc second resolution.¹⁴ The antenna gain toward the horizon is derived from antenna manufacturer calculations.¹⁵ The PFD contour is generated using the worst-case input power density rather than the input power density during clear sky conditions.¹⁶

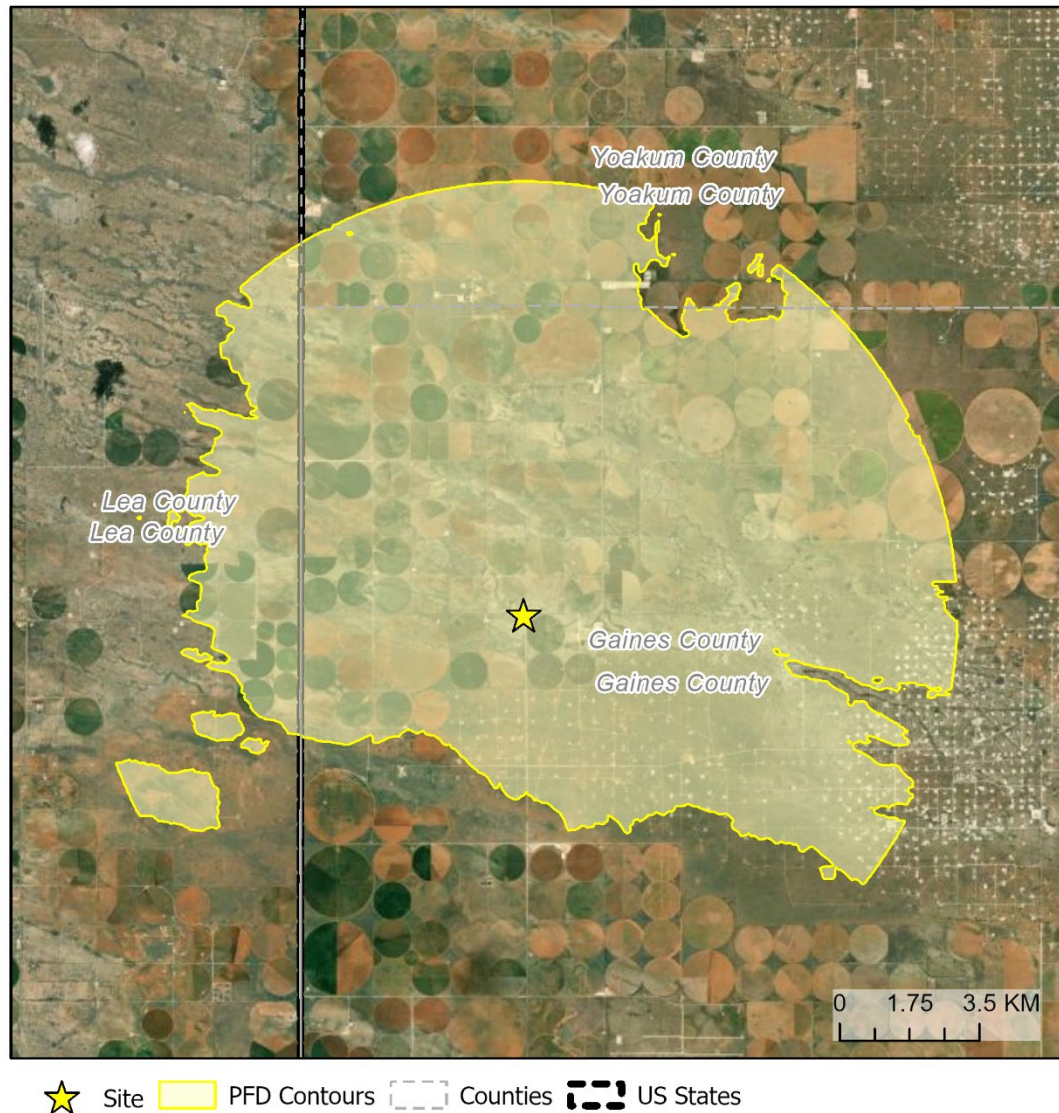
Figure 2 shows Amazon's PFD contour in Google Earth (shapefile attached in KML format) and confirms the contour complies with the Guidance.

¹⁴ See Guidance, 35 FCC Rcd at 6349 (computing PFD contours and protection zones at bullets 2 and 4). For the application of ITU-R Recommendation P.452, no clutter was included.

¹⁵ See Guidance, 35 FCC Rcd at 6349 (computing PFD contours and protection zones at bullet 3).

¹⁶ See *id.* (computing PFD contours and protection zones at bullet 5).

Figure 2. Gateway PFD Contour (-77.6 dBm/m²/MHz)



Section 25.136(a)(4)(ii) (-77.6 dBm/m²/MHz PFD contour covering only certain population totals)

Section 25.136(a)(4)(ii) requires the applicant to demonstrate that “[t]he area in which the earth station generates a PFD, at 10 meters above ground level, of greater than or equal to -77.6 dBm/m²/MHz, together with the similar area of any other earth station authorized pursuant to paragraph (a) of this section, does not cover, in the aggregate, more than the amount of population of

the UMFUS license area within which the earth station is located as noted in table 2 to this paragraph (a)(4)(ii).”¹⁷ The table is reproduced below:

Table 2. Section 25.136(a)(4)(ii) Population Limits

Population with UMFUS license area	Maximum permitted aggregate population within -77.6 dBm/m²/MHz PFD contour
Greater than 450,000	0.1 percent of population in UMFUS license area.
Between 6,000 and 450,000	450 people.
Fewer than 6,000	7.5 percent of population in UMFUS license area.

The PFD contour overlaps several census blocks within Gaines County, TX, Yoakum County, TX, and Lea County, NM. The population in Gaines County totals 21,598 people, the population in Yoakum County totals 7,694 people, and the population in Lea County totals 74,445 people, according to 2020 U.S. Census Bureau data.¹⁸ As a result, the maximum population permitted within the FSS gateway’s -77.6 dBm/m²/MHz PFD contour is 450 people in each county. Amazon’s analysis demonstrates that the proposed gateway’s PFD contour covers 107 people in Gaines County, 32 people in Yoakum County, and 13 people in Lea County. These are all less than the 450 limit in each county—using 2020 U.S. Census Bureau data and the actual area method.¹⁹

Section 25.136(a)(4)(ii) considers the aggregate population covered by the proposed earth station and the FSS earth stations operating in the 27.5-28.35 GHz band within the County. At the time of filing, there are no other earth station license applications within Gaines County, Yoakum County, or Lea County.²⁰ Therefore, the Amazon earth station’s PFD contour, together with the PFD

¹⁷ 47 C.F.R. § 25.136(a)(4)(ii).

¹⁸ See Yoakum County TX, Lea County NM, Gaines County TX, U.S. Census Bureau, <https://www.census.gov/quickfacts/fact/table/yoakumcountytexas,gainescountytexas,leacountynewmexico/PST045225> (last visited Jul. 22, 2026).

¹⁹ See Guidance, 35 FCC Rcd at 6350 (determining estimated aggregate population coverage at bullet 2).

²⁰ See *supra* note 10.

contours from the other FSS earth stations in these counties, do not exceed the section 25.136(a)(4)(ii) aggregate population coverage allowance of 450 people for each county.

Figure 3 shows in yellow the census blocks that are fully or partially covered by the PFD contour. Table 3 shows the total population, fractional area coverage, and the resulting calculated population coverage for each fully and partially covered census block with non-zero population. Table 4 shows the total population covered in each county that the PFD contour overlaps.

Figure 3. Census Block and Population Coverage of Gateway PFD Contour

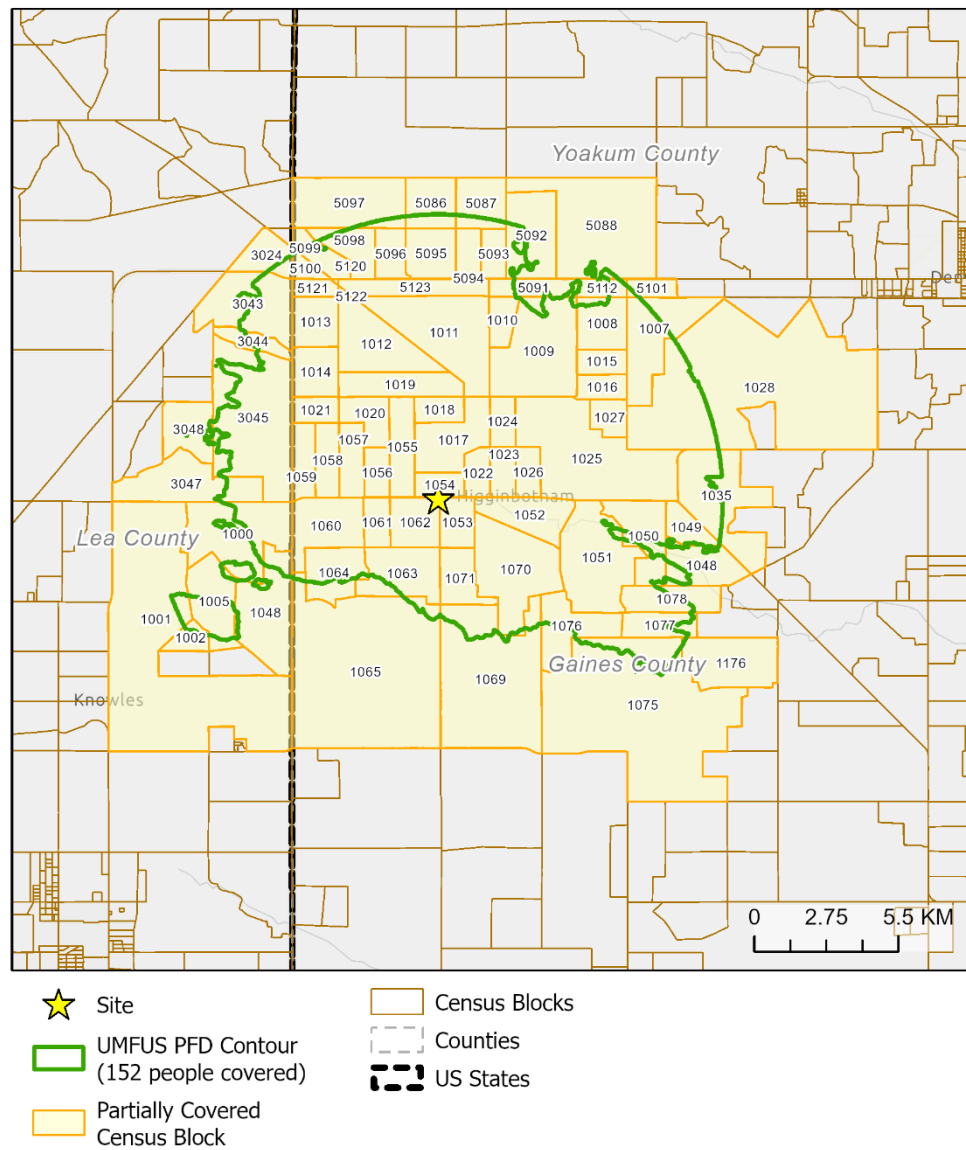


Table 3. PFD Contour Population Coverage, by Census Block (Blocks with Zero Population Not Listed)

State	County	Block ID	Block Population	Coverage Fraction	Covered Population
New Mexico	Lea	350250007011001	18	2%	0
New Mexico	Lea	350250007011048	6	15%	1
New Mexico	Lea	350250011003024	7	17%	1
New Mexico	Lea	350250011003045	11	78%	9
New Mexico	Lea	350250011003047	10	20%	2
Texas	Gaines	481659502021007	9	65%	6

Texas	Gaines	481659502021008	4	91%	4
Texas	Gaines	481659502021012	7	100%	7
Texas	Gaines	481659502021013	7	100%	7
Texas	Gaines	481659502021015	2	100%	2
Texas	Gaines	481659502021017	12	100%	12
Texas	Gaines	481659502021019	2	100%	2
Texas	Gaines	481659502021020	19	100%	19
Texas	Gaines	481659502021022	1	100%	1
Texas	Gaines	481659502021023	8	100%	8
Texas	Gaines	481659502021024	10	100%	10
Texas	Gaines	481659502021025	10	100%	10
Texas	Gaines	481659502021027	4	100%	4
Texas	Gaines	481659502021028	7	22%	2
Texas	Gaines	481659502021057	9	100%	9
Texas	Gaines	481659502021058	1	100%	1
Texas	Gaines	481659502021065	8	2%	0
Texas	Gaines	481659502021069	16	14%	2
Texas	Gaines	481659502021075	10	8%	1
Texas	Yoakum	485019502005087	4	21%	1
Texas	Yoakum	485019502005088	12	2%	0
Texas	Yoakum	485019502005091	10	36%	4
Texas	Yoakum	485019502005092	8	18%	1
Texas	Yoakum	485019502005094	4	100%	4
Texas	Yoakum	485019502005096	4	100%	4
Texas	Yoakum	485019502005097	3	7%	0
Texas	Yoakum	485019502005100	5	98%	5
Texas	Yoakum	485019502005101	2	8%	0
Texas	Yoakum	485019502005122	3	100%	3
Texas	Yoakum	485019502005123	10	100%	10

Table 4. PFD Contour Population Coverage, by County

State	County	County Population	Allowable Population Coverage	Covered Population
Texas	Gaines	21,598	450	107
Texas	Yoakum	7,694	450	32
New Mexico	Lea	74,445	450	13

Section 25.136(a)(4)(iii) (major event venue, urban mass transit route, passenger railroad, cruise ship port, Interstate, Other Freeways and Expressways, or Other Principal Arterial in the -77.6 dBm/m²/MHz PFD contour)

Section 25.136(a)(4)(iii) requires an applicant to demonstrate as follows:

The area in which the earth station generates a PFD, at 10 meters above ground level, of greater than or equal to -77.6 dBm/m²/MHz does not contain any major event venue, urban mass transit route, passenger railroad, or cruise ship port. In addition, the area mentioned in paragraph (a)(4)(ii) of this section shall not cross any of the following types of roads, as defined in functional classification guidelines issued by the Federal Highway Administration pursuant to 23 CFR 470.105(b): Interstate, Other Freeways and Expressways, or Other Principal Arterial. The Federal Highway Administration Office of Planning, Environment, and Realty Executive Geographic Information System (HEPGIS) map contains information on the classification of roads. For purposes of this rule, an urban area shall be an Adjusted Urban Area as defined in section 101(a)(37) of Title 21 of the United States Code.²¹

Using Google Earth, visual analysis, and shapefile data available on data.gov and the U.S. Census Bureau website, Amazon determined that the proposed gateway's -77.6 dBm/m²/MHz PFD contour does not contain any major event venue, urban mass transit route, passenger railroad, or cruise ship port. The PFD contour does not overlap any such infrastructure. Further, the PFD contour does not cross any Interstate, Other Freeways and Expressways, or Other Principal Arterial, as defined by the Federal Highway Administration Office of Planning, Environment, and Realty Executive Geographic Information System.²² The proposed gateway, therefore, is consistent with the requirements of section 25.136(a)(4)(iii).

Section 25.136(a)(4)(iv) (coordination with existing UMFUS licensees located within a PFD contour greater than or equal to -77.6 dBm/m²/MHz)

Section 25.136(a)(4)(iv) requires the applicant to demonstrate that it “has successfully completed frequency coordination with the UMFUS licensees within the area in which the earth station generates a PFD, at 10 meters above ground level, of greater than or equal to -77.6

²¹ 47 C.F.R. § 25.136(a)(4)(iii).

²² See *Planning, Environment, Realty (HEP) HEPGIS*, U.S. Dep't of Transp. Fed. Highway Admin., <https://hepgis-usdot.hub.arcgis.com> (last visited Jul. 22, 2026).

dBm/m²/MHz with respect to existing facilities constructed and in operation by the UMFUS licensee.”²³ The applicant is required to use the applicable processes in section 101.103(d) in coordinating with UMFUS licensees.²⁴

Exhibit A, the Comsearch Report, establishes that Amazon has completed coordination with existing UMFUS licensees, as section 25.136(a)(4)(iv) requires.²⁵

²³ 47 C.F.R. § 25.136(a)(4)(iv).

²⁴ *See id.*

²⁵ *See id.* § 101.103(d).