

EXHIBIT A

DESCRIPTION OF PROPOSED MODIFICATION

Omnitracs, LLC (“Omnitracs”) seeks Commission consent to modify its license (Call Sign E960474 or “Boatracs license”) to operate mobile earth stations (“MESs”) in the 11.7-12.2 GHz (downlink) and 14.0-14.5 GHz (uplink) frequency bands (“Ku band”).

Proposed Boatracs License Modifications. Omnitrac requests the following license modifications:

- (1) the addition of a new remote control/hub station to the remote control/hub stations specified in the existing Boatracs license—*i.e.*, Canadian-licensed remote control/hub station (Call Sign CZ294) at 2055 Flavelle Boulevard, Mississauga, Ontario, Canada L5K 1Z8, Telephone: (905) 403-2114; and
- (2) the modification of the specific operating frequencies listed on the existing Boatracs license to include 14018.712-14033.288 MHz and 14090.085-14100.085 MHz for uplinks (transmit mode) (in addition to the currently licensed 14200.000-14450.000 MHz) and 12066.375-12069.375 MHz, 11957.500-11960.500 MHz, and 11710.500-11713.500 MHz for downlinks (receive mode) (all of which are included within the currently licensed 11700.000-12200.000 MHz band for downlinks).

All other technical parameters specified under the existing Boatracs license will remain the same.

Transition of Boatracs Customers from Omnitrac to Shaw. On or about May 31, 2015, Omnitrac plans to discontinue service to the end-user customers served by the Boatracs license. Upon the service discontinuance, the customers will be migrated to Shaw Satellite Services Inc. (“Shaw”), the proposed assignee of the Boatracs license pursuant to a separate license assignment application that the Commission recently placed on public notice (“Assignment

Application”).¹ The proposed Boatracs license modifications are intended to facilitate Shaw’s ability to serve the customers following consummation of the license assignment and the migration of the customers to Shaw’s network, as well as to prevent any customer disruption during the transition of the Boatracs MESs from Omnitrac’s network to Shaw’s network. For a variety of technical reasons, the Boatracs customers cannot be transitioned from Omnitrac’s network to Shaw’s network pursuant to a flash cut, but instead must be transitioned on a rolling basis over a period of time to ensure the maximum effective successful MES transition. Specifically, existing MESs authorized under the Boatracs license will be retuned on a rolling basis to communicate with Shaw’s Canadian-licensed remote control/hub station and to operate on the same frequencies authorized under Shaw’s existing Canadian license to operate similar Ku-band MESs throughout Canada. The parties do not anticipate the replacement of any MESs as part of this process.

Up to 75 percent of the existing Boatracs MESs are expected to be retuned and transitioned within an initial three-day period. Maximizing the transition of the remaining 25 percent of the Boatracs MESs, however, will require up to several weeks of additional time because MESs could, for example, be temporarily turned off. Therefore, concurrently herewith, Omnitrac is filing an application seeking special temporary authority (“STA”) to serve the Boatracs customers during this transition period pursuant to the technical parameters specified in this modification application. The transition process would commence promptly upon Commission action on the STA application in order to provide sufficient time to transition those

¹ See *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Public Notice, Rpt. N. SES-01734 (Mar. 25, 2015) (accepting assignment application filing, File No. SES-ASG-20150313-00147).

MESs that cannot be transitioned during the initial 72 hours and to avoid any disruptions to the operations of Boatracs customers during the transition.

During the transition period (*i.e.*, from Commission action on the STA application until consummation of the proposed license assignment), Omnitrac's will provide service to the Boatracs customers using a combination of Omnitrac's network and Shaw's network. To the extent that Omnitrac's provides service to initially transitioned Boatracs customers using Shaw's network facilities during the transition period, Omnitrac's will do so pursuant to an arrangement with Shaw and under Omnitrac's ultimate supervision and oversight. Throughout the transition period, all Boatracs customers will be provided service via U.S.-licensed and non-U.S.-licensed satellites specified on the FCC's Permitted Space Station List, including the Anik F2 and Galaxy 25 (formerly Telstar 5) satellites. No later than May 31, 2015, the transition will be deemed complete, the Boatracs license and Boatracs customers will be assigned to Shaw (assuming that the Assignment Application previously has been granted by the Commission), and Omnitrac's will discontinue service.

Contact information for Omnitrac's can be found in the FCC Form 312 associated with this Exhibit. In addition, pursuant to the Commission's request, a U.S. point of contact will be made available 24 hours a day, 7 days a week, for inquiries regarding the Boatracs MESs that are being operated by Omnitrac's during the transition period under an arrangement with Shaw and using Shaw's remote control/ hub station and associated frequencies, as follows:

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Public Interest Statement. Commission approval of the proposed license modifications will serve the public interest by ensuring continuity of service to the Boatracs customers,

facilitating the orderly transition of the Boatracs MESs without disruption to Shaw's Canadian-licensed remote control/hub station and associated frequencies, and enabling the provision of harmonized subscriber equipment throughout the United States and Canada, thus resulting in economies of scale.