ATTACHMENT

Description of Application for Modification of License

1.0 OVERVIEW

Anuvu Licensing Holdings LLC ("Anuvu") seeks modification of its Ku-band Earth Stations Aboard Aircraft ("ESAA") license (Call Sign E080100) for the purpose of adding an additional satellite point of communication, the Horizons 2 ("H2") satellite located at 73.8° West Longitude ("73.8° W.L."). Anuvu seeks this modification subject to all terms and conditions set forth in its current license[1] and the operations proposed are otherwise consistent with the technical specifications set forth in its license. Operations using the additional satellites would use both the TECOM Ku-Stream (SAA/Remote 2) and QEST Q050000 (GSAA/Remote 3) antennas. The Form 312, Schedule B associated with this filing reflects only the additional point of communication and does not recapitulate all technical data contained in its current license. All existing information contained in the current license should be carried forward to the license as modified.

2.0 ADDITIONAL POINT OF COMMUNICATION REQUESTED

Anuvu requests the addition of H2 to provide expanded coverage of the geographic locations described below. Complete technical information regarding this satellite is already a matter of record before the FCC and the satellite is included in the International Bureau's Approved Space Station List. *See* FCC File No. SAT-MOD-20200114-00009 (Call Sign S2423). Anuvu therefore simply requests that its existing ESAA license be updated to reflect use of H2 on a primary basis for ESAA transmit operations in the 14-14.5 GHz band.

The addition to the Anuvu license of authority to communicate using H2 will provide additional near-term space segment capacity for Anuvu's ESAA network, thereby allowing it to provide continued and expanded throughput and coverage for the provision of its in-flight Wi-Fi connectivity services to airline passengers on flights operating throughout the contiguous United States and in the Caribbean. This capacity is immediately available for use, and Anuvu therefore seeks modification of its authority as quickly as possible.

3.0 COORDINATION CERTIFICATION FROM INTELSAT [47 C.F.R. §§ 25.228(a) & 25.220(d)]

Anuvu's intended operations are within the scope of use that Intelsat has coordinated with the adjacent satellite operators within six degrees adjacent to H2 in either direction along the geostationary arc and should not cause harmful interference to any of these satellites operating in accordance with FCC's two-degree spacing policy. Exhibit A attached hereto is a copy of the coordination certification letter from Intelsat covering Anuvu's proposed operations.

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[1] *See* Call Sign E080100, FCC File No. SES-MFS-20210127-00153 (granted in part/deferred in part, Nov. 12, 2021).

In the event that a new Ku-band NGSO FSS system is launched in the future, Anuvu would enter into coordination with the NGSO FSS system operator to establish operating parameters that permit successful co-frequency sharing and would modify its operations as necessary to implement any coordination agreement reached. Anuvu acknowledges that the Commission may condition the grant of any modified license issued to it upon a requirement that it complete such coordination at the appropriate time.

4.0 TECHNICAL DATA AND PREDICTED COVERAGE AREA [47 C.F.R. § 25.227(b)(4)]

Exhibit B attached hereto includes illustrations detailing the geographic coverage contours for operations using the H2 satellite.

5.0 REVISED SPACECRAFT, FREQUENCY & BEAM COVERAGE

Table 1a: Spacecraft, Frequency & Beam Coverage Table (U.S. Licensed Satellites)

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Satellite Operator
Echostar 9	121° W	North America and Caribbean	14.05-14.47	11.7-12.2	**Echostar**
AMC-1	130.9 W	North America, Central America, and Pacific	14.05-14.47	11.7-12.2	**SES**
AMC-2	84.85 W	North America, Caribbean and North Atlantic	14.05-14.47	11.7-12.2	
AMC-3	72.0 W	North America, Central America, Atlantic and Caribbean	14.05-14.47	11.7-12.2	
AMC-9	83.0 W	North America, Caribbean, Central America and North Atlantic	14.05-14.47	11.7-12.2	
SES-1	101.0 W	North America, Central America, Pacific and Caribbean	14.05-14.47	11.7–12.2	
SES-10	67.0W	North America, Central America, South Atlantic and Caribbean	14.05-14.47	11.7-12.2	
SES-15	129.0 W	North America, Central America, Caribbean, and Pacific	14.05-14.47	10.7-10.95, 10.95-11.2, 11.2-11.45, 11.45-11.7, 11.7-12.2	

= Point of Communication Added in this Application

Table 1b: Spacecraft, Frequency & Beam Coverage Table
(Non-U.S., Permitted List Satellite)

Satellite	Location	Beam Coverage Area	Tx (GHz)	Rx (GHz)	Satellite Operator
Anik-F1R	107.3 W	North America, Gulf of Mexico, and Caribbean	14.05-14.47	11.7-12.2	**Telesat**
Anik-F1	109.2 W	North America, Gulf of Mexico, and Caribbean	14.05-14.47	11.7-12.2	
Eutelsat 115 WB	114.9 W	North America, North Atlantic and Pacific Ocean	14.05-14.47	11.7-12.2	**Eutelsat**
Eutelsat 139 WA	139 W	North America and Pacific Ocean	14.05-14.47	10.95-11.2, 11.45-11.7, 12.5-12.75*	
Horizons 2	73.8 W	North America, Atlantic Ocean, and Caribbean	14.05-14.47	11.7-12.2	**Intelsat**

* Application pending (deferred portion of IBFS File No. SES-MFS-20210127-00153)

6.0 TELEPORT UPLINK LOCATIONS

Table 2: Teleport Locations for Provision of Service within the United States

Satellite	Orbital Location	Teleport Location(s)	Site Operator	Call Sign(s)
AMC-1	130.9 W	Holmdel, NJ	Anuvu	E160163
AMC-2	80.85W	N. Las Vegas, NV	Hughes	E940460
AMC-3	72.0 W	Holmdel, NJ	Anuvu	E160163
AMC-9	83.0W	North Las Vegas, NV	Hughes	E940460
SES-1	101.0W	North Las Vegas, NV	Hughes	E940460
SES-10	67.0W	Steele Valley, CA	Level 3/ Vyvx	E950202
SES-15	129.0 W	South Mountain, CA	SES	E170139
Anik-F1R	107.3 W	Holmdel, NJ	Anuvu	E070218
Anik-F1	109.2W	Atlanta. GA	Lumen	E850041
Echostar 9	121 W	Atlanta, GA	Lumen	E850041
Eutelsat 115 WB*	114.9W	Southfield (Detroit), MI	Hughes	E990170
Eutelsat 139 WA*	139 W	Jordan, UT	LBiSat	E030342
Horizons 2	73.8 W	Atlanta, GA	Lumen	E850041

* = Non-U.S.-licensed satellite included on Ku-band Permitted List

7.0 LICENSEE CERTIFICATION

I, Simon McLellan, Chief Engineer of Anuvu Licensing Holding LLC hereby certify that Anuvu:

(1) will continue to comply with the requirements of Section 25.228 of the Commission's Rules and the conditions of its existing license; and

(2) has confirmed, as shown by the four coordination certification letters submitted with this application, that the ESAA operations proposed herein are within coordinated parameters for adjacent satellites up to 6 degrees away on the geostationary arc from each new satellite requested.

Simon McLellan

Simon McLellan
Chief Engineer
Anuvu

December 21, 2022