

**EXHIBIT A – NARRATIVE STATEMENT**

Pursuant to COMSAT LLC's ("COMSAT") application for renewal of Call Sign E980137 ("Application"), COMSAT submits this narrative statement to address certain discrete points of its Application.

**I. Main Form 312R**

In the ICFS system, COMSAT is unable to select any options from the drop-down menu under Question 17a of the Main Form 312R. For this reason, it is left blank.

To remain consistent with previous filings under Call Sign E980137, COMSAT references multiple Sites in Schedule B, despite all Sites and antennas on the Application being located within the same teleport location in Santa Paula, California. For this reason, COMSAT answers Question 17c of the Main Form 312R as reflecting that the Application includes multiple Sites.

As regards COMSAT's response to Question 25d of the Main Form 312R, COMSAT understands that the requirements of 47 C.F.R. 25.137 are not applicable because the Points of Communication identified in the Schedule B have already obtained U.S. market access authorization and are on the Approved Space Station List.

**II. Schedule B**

Pursuant to Schedule B, Question 3(b) for Site 1-16.4M, COMSAT understands that frequency coordination is required given antenna 16.4M's use of extended C-band frequencies. With respect to coordination, please be aware that antenna 16.4M is a longstanding authorized facility by the Federal Communications Commission ("FCC"). The FCC has previously authorized the operations described in the Application for this antenna based on frequency coordination reports

previously submitted by the Applicant and its predecessors. Those frequency coordination reports are hereby incorporated by reference into this Application.<sup>1</sup>

COMSAT is not seeking any modification to the coordinated parameters, and no changes have been made to the technical characteristics on which the prior coordination was based. Accordingly, the previously submitted coordination remains valid and continues to support the operations for which renewal is requested, and COMSAT will continue to comply with such frequency coordination parameters. Additionally, COMSAT, concurrently with submission of this Application, will reaffirm its 24-hour emergency contact phone number to relevant federal agencies: 805-933-4010.

Finally, this Application proposes no changes to the operational parameters at the Santa Paula, California teleport. Any differences between the data in this Application's Schedule B and the data reflected in the current authorization result solely from necessary corrections to the prior authorization and the resulting auto-calculations generated by the FCC's ICFS system,<sup>2</sup> which more accurately reflect the existing operating parameters at the Sites. COMSAT confirms that these variations are administrative in nature and do not represent any modification to the authorized infrastructure or its operation. Accordingly, the facility continues to operate in full conformance with the terms of its existing authorization.

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<sup>1</sup> See, e.g., File Number SES-MFS-20140630-00548.

<sup>2</sup> For example, the range of satellite arc western limit for antenna 16.4M in the frequency range 6454.4-6456.6 MHz has been updated to 179 degrees East to ensure the resulting antenna elevation and azimuth angle limits are calculated to align with the correct operational arc of the 16.4M antenna.