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Via ICFS

August 17, 2026

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20054

Re: Notice of *Ex Parte* Presentation,
ICFS File No. SAT-MOD-20251206-00374

Dear Ms. Dortch:

On August 13, 2026, the undersigned representing Ligado Networks Subsidiary LLC, Debtor-in-Possession ("Ligado"), Vicky McPherson, Sachin Chhibber, and Vernon Ross of Ligado, and Jennifer Manner and Ben Wagner of AST & Science, LLC ("AST") met by telephone and video conference with Michael Ha, Ira Keltz, Nicholas Oros, and Jamison Prime of the Office of Engineering and Technology, Jennifer Gilsenan, Karl Kensinger, Stephanie Neville, and Julia Tu of the Space Bureau, and Jessica Greffenius of the Wireless Telecommunications Bureau. At the meeting, Ligado and AST discussed the points set forth in the attached presentation, parts of which are redacted in the public version of this filing for purposes of confidentiality. Ligado and AST explained that Ligado's application and arrangements will advance the Commission's goal to promote direct-to-device (D2D) service and enhance U.S. leadership in leveraging our satellite capabilities to deliver broadband services to smartphones and other mobile devices. We also stressed that the pending application is consistent with long-standing Commission rules and precedent and will not cause harmful interference to adjacent band services.

Ligado provides further information in response to questions raised by staff during the meeting below:

- SkyTerra Next transmit chains will employ digital linearizers to linearize the Solid State Power Amplifiers in the phased array antenna to achieve an excellent Adjacent Channel Leakage Ratio and sharp-cutoff filtering to ensure OOBE meets or exceeds the attenuation requirements in 47 C.F.R. § 25.202(f).

- The difference in path loss from NGSO satellites positioned at 690 kilometers to a receiver positioned on the ground versus positioned at ~30,000 feet is approximately 0.1 dB. Since the difference is *de minimis*, the results of the analysis described in the attached presentation apply equally to both scenarios.

Ligado has also provided a response to a technical question involving proprietary and confidential business information under the attached request for confidential treatment.

Please direct any questions to the undersigned.

Respectfully submitted,

/s/ *Gerard J. Waldron*
Gerard J. Waldron
John D. Bowers
Counsel to Ligado Networks

cc: Michael Ha
Ira Keltz
Nicholas Oros
Jamison Prime
Jennifer Gilsenan
Karl Kensinger
Stephanie Neville
Julia Tu
Jessica Greffenius

Attachments

Appendix A – Presentation

L Band Analysis

AUGUST 13, 2026

ligado NETWORKS | Making Stronger Connections

AST SpaceMobile

AST System Overview

The First and Only Space-based Cellular Broadband Network

- Superior Beam Control: AST SpaceMobile's large, phased array antenna creates highly precise beams with a sharp roll-off, meaning the signal fades quickly outside the target area
- Designed to enable peak data speeds of nearly 200 Mbps directly to standard smartphones, enabling voice, broadband data, and video from space
- No Near-Far Effect: Satellite signals avoid the "near-far" problem that terrestrial networks encounter, where closer signals overpower weaker ones.

SkyTerra Next Key Characteristics

- The AST SpaceMobile space-based mobile broadband Low Earth Orbit constellation will be operating at an altitude of 690 km.
  - One satellite per orbital plane, 53 degrees inclination, with an orbital period of 1 hour and 38 minutes.
  - The L band will be supported by 96 Space Station payloads installed on AST SpaceMobile satellites, operating in L-band, in a “bent-pipe” architecture.

- The L band payload will be licensed to operate in:
  - Downlink: 1525–1544 MHz and 1545-1559 MHz
  - Uplink: 1626.5–1645.5 MHz and 1646.5-1660.5 MHz

- Satellites will have electronically steerable phased array system capable of multiple shapeable beams

- L-band spectrum will be utilizing 3GPP NR technology operating on 10 MHz channels that uses 15 kHz subcarriers

[redacted]

- Space Station transmit chains will employ Digital Pre-Distortion (DPD), sharp-cutoff filtering

Analysis Summary

1. Out-of-Band Emissions i.e., emissions in the GPS Band
   - Assessment criteria: 1-dB C/N_o degradation i.e., -6 dB I/N threshold
   - This assessment showed a minimum of 19 dB of margin

[redacted]

#	Assessment	Criteria	Minimum Margin
1	OOBE Emissions (Emissions in the GPS Band)	1-dB C/No degradation	19 dB

[redacted]

DO-229F: The Out-of-Band CW Interference Levels at the Antenna Port

C.2.1 Out-of-Band Interference

The out-of-band continuous wave (CW) interfering signals can be as high as the levels shown in Figure C-1, measured at the antenna port. The CW interference level below 1500 MHz increases linearly to 25.5 dBm at 1315 MHz. The CW level increases linearly above 1640 MHz, to 21.5 dBm at 2 GHz, accounting for High Intensity Radiation Fields (HIRF).

Appendix C
C-2

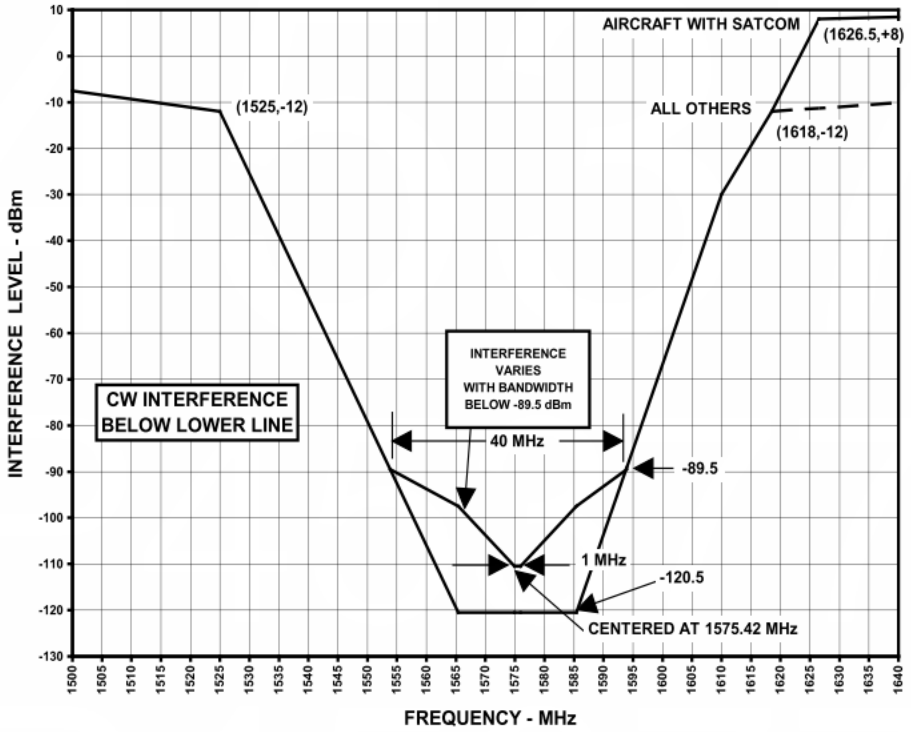

Figure C-1: Interference Levels at the Antenna Port

CW (100 Hz) Limit vs. SkyTerra Next Power Level

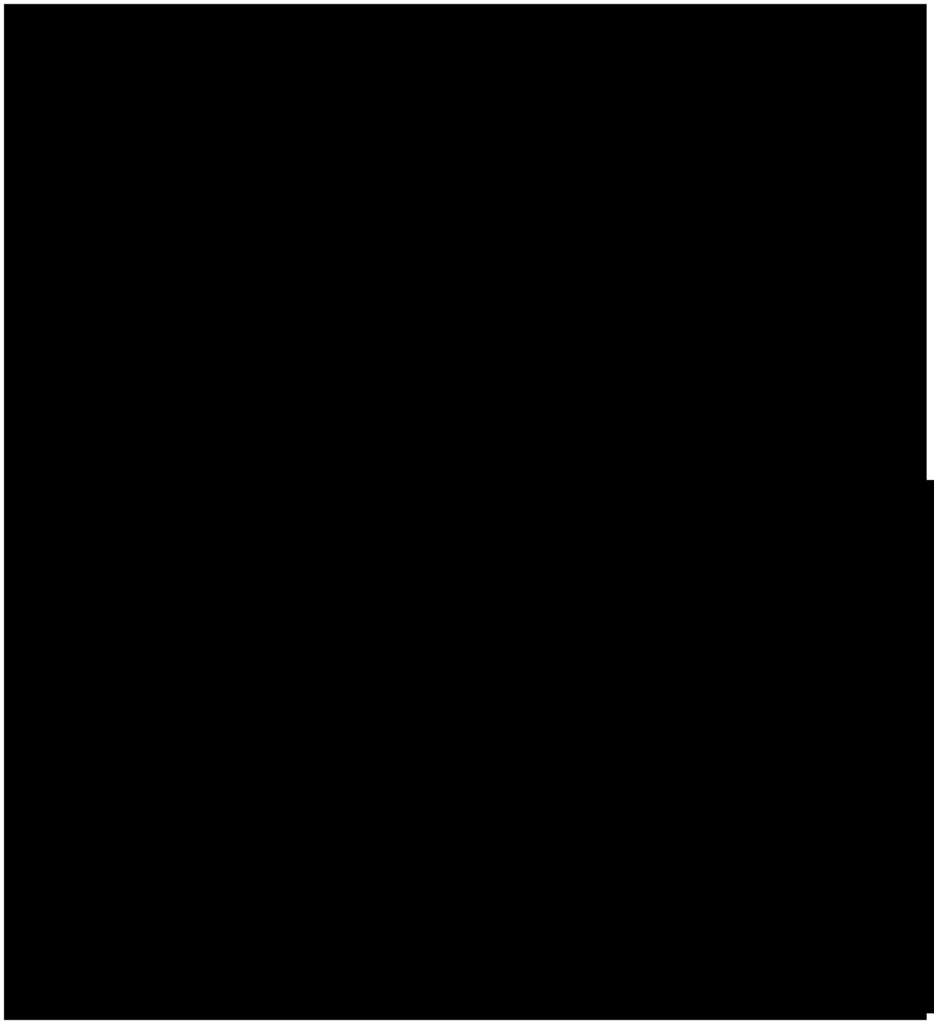

Figure 1: Power vs Frequency with RTCA Limit

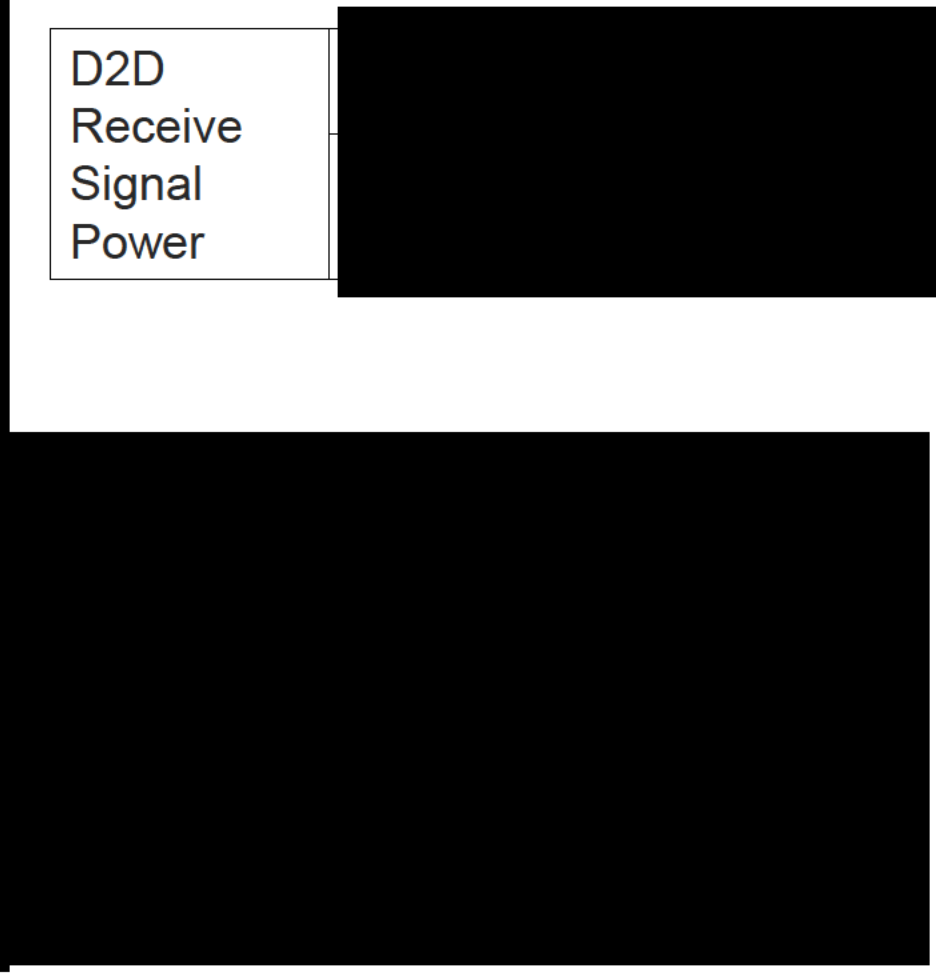

Figure 2: Power vs Frequency (Zoomed)

In-Band MSS Power Assessment

Even with conservative assumptions, positive margins exist for all scenarios

Ref Bandwidth	CW (100Hz)	15 kHz	10MHz
[redacted]			

Appendix B – Response to Staff Question

[redacted]