



Federal Communications Commission
Washington, D.C. 20554

September 25, 2014

DA 14-1353

Joseph A. Godles
Goldberg Godles Wiener & Wright LLP
1229 19th Street, NW
Washington D.C. 20036

Re: Skynet Satellite Corporation
IBFS File No. SAT-LOA-20140709-00084

Dear Mr. Godles:

On July 9, 2014, Skynet Satellite Corporation (Skynet) filed the above-captioned application for authority to launch and operate the Telstar 12 Vantage satellite (Call Sign S2928) at the 15° W.L. orbital location. For the reason discussed below, we dismiss the application as defective, without prejudice to re-filing.

Section 25.112 of the Commission's rules, 47 C.F.R. § 25.112, requires the Commission to return, as unacceptable for filing, any space station application that is not substantially complete, contains internal inconsistencies, or does not substantially comply with the Commission's rules. Skynet's application is incomplete because the Schedule S did not specify the telemetry, tracking and command (TT&C) frequencies and their associated polarization data as required by Section 25.114(c)(4)(i), 47 C.F.R. § 25.114(c)(4)(i).

Accordingly, pursuant to Section 25.112(a)(1) of the Commission's rules, 47 C.F.R. § 25.112(a)(1) and Section 0.261 the Commission's rules on delegations of authority, 47 C.F.R. § 0.261, we dismiss the application of Skynet Satellite Corporation, without prejudice to re-filing.¹

We note that since the filing of Skynet's application, revisions to Part 25 of the Commission's rules governing the licensing and operation of space stations have become effective. *See Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Report and Order, IB Docket No. 12-267, FCC 13-111, 28 FCC Rcd 12403 (2013) (effective Sept. 5, 2014). In any re-filing, Skynet must submit information in compliance with the new rules.²


In addition, although not grounds for dismissal, we request in any re-filing additional information regarding Skynet's request for a waiver of Section 25.283 of the Commission's rules, 47 C.F.R. § 25.283. Section 25.283(c) specifies that space stations must discharge all stored energy sources at the

¹ If Skynet refiles an application containing the TT&C information as requested in this letter, it need not pay an application fee. *See* 47 C.F.R. § 1.111(d).

² Section 25.114(c)(4)(i) now requires for each space station transmitting and receiving antenna beam, including telemetry and tracking beams, that applicants specify each channel center frequencies and bandwidths and polarization plan. For command beams, applicants must specify each of the center frequencies within a 5 MHz range or a range of 2 percent of the assigned bandwidth, whichever is smaller, and the polarization plan. 47 C.F.R. § 25.114(c)(4)(i).

end-of-life of the space station by venting excess propellant, discharging batteries, relieving pressure vessels, and other appropriate measures. Section 25.114(d)(14)(ii) requires applicants to demonstrate how stored energy will be removed at the spacecraft's end-of-life, 47 C.F.R. § 25.114(d)(14)(ii). Skynet states that due to Telstar 12 Vantage's design, "the propellant and pressurant tanks are isolated from each other when the satellite reaches geostationary orbit. Once the tanks have been isolated from each other, the remaining helium in the pressurant tank cannot be vented."³ We request that Skynet also provide: 1) the mass of the remaining helium left in the tank, in kilograms; and 2) and the volume of the tank, in liters, in which the remaining helium will be contained.

Sincerely,



Jose P. Albuquerque
Chief, Satellite Division
International Bureau

³ Skynet Satellite Corporation, IBFS File No. SAT-LOA-20140709-00084, Narrative at 5.