

NARRATIVE

Skynet Satellite Corporation (“Skynet”) hereby requests that the Commission modify the license for Telstar 12, S2462, by extending the satellite’s license term through and including November 30, 2017. Skynet demonstrates below that an extension will enable it to provide continuous service to its customers. Grant of Skynet’s extension request, therefore, is in the public interest.

The Commission previously licensed Skynet’s predecessor in interest to launch and operate Telstar 12 at 15° W.L.¹ Absent an extension, the license term for Telstar 12 will expire on December 10, 2014.

Skynet has customers that require service at 15° W.L. beyond December 10, 2014. Although construction of a replacement satellite for 15° W.L., Telstar 12V,² is underway,³ the replacement is not scheduled to be launched until late 2015 and is not expected to be in service until the first quarter of 2016. To continue serving customers at 15° W.L., therefore, Skynet needs an extension of Telstar 12’s license.

Skynet calculates that Telstar 12 has sufficient fuel to provide reliable service during the proposed license term and to execute end-of-life maneuvers that will place the satellite in a disposal altitude of approximately 300 km above the geostationary orbit, barring a catastrophic failure of satellite components. In making this assessment, Skynet has assumed that standard

¹ See *Loral Orion Services, Inc.*, Order, 15 FCC Rcd. 12419 (IB 2000); *Orion Satellite Corp.*, Order and Authorization, 10 FCC Rcd. 12307 (IB 1995).

² Telstar 12V includes a Ku-band payload, which will replace and expand the coverage of the Ku-band payload on Telstar 12, and a Ka-band payload. See File No. SAT-LOA-20141010-00107 (filed Oct. 10, 2014). The Telstar 12V application appeared on Public Notice as accepted for filing on Nov. 7, 2014 (Report No. SAT-01051).

³ See Skynet’s Telstar 12V milestone showing, filed on Oct. 28, 2014, File No. SAT-LOA-20141010-00107 (Letter from Joseph A. Godles, Counsel to Skynet Satellite Corporation, to Jose Albuquerque, Chief, Satellite Division).

station keeping maneuvers will be performed to maintain existing east-west and north-south station keeping tolerances.⁴ Skynet has no current plan to operate Telstar 12 in an inclined orbit at 15° W.L.⁵

Skynet is requesting a license term extension through November 30, 2017, to maximize flexibility in case, for example, the initiation of service on Telstar 12V is delayed. Skynet has no specific plan for relocating Telstar 12 to a different orbital location. Should the need arise to relocate the satellite, Skynet will seek additional authority, as appropriate, at that time, and will provide an updated fuel assessment.

Although there have been anomalies, the overall health of Telstar 12 is good. One of two command receivers failed, but a Redundant Command Unit (“RCU”) software patch was uploaded that restored redundancy. As Skynet’s parent has previously reported publicly,⁶ Telstar 12 experienced some solar array string failures that affected the total power available to the spacecraft. Apart from some failures of payload units, all other satellite subsystems are functioning nominally. There is no single point of failure in the satellite’s design; and with the RCU patch in place, the satellite has redundancy for tracking, command and telemetry.

In sum, extending the license term for Telstar 12 through and including November 30, 2017, will facilitate continuity of service and is consistent with the fuel budget and health of the satellite. Accordingly, grant of this license extension application is in the public interest.

⁴ Skynet’s calculations are consistent with the most recent SEC filing of its parent company, Telesat Holdings Inc. See Telesat Holdings Inc., Annual Report, SEC Form 20F, Item 4, Section D, p. 42, which can be accessed at http://www.sec.gov/Archives/edgar/data/1465191/000114420414011088/v366164_20f.htm.

⁵ Should Skynet later decide to operate the satellite in inclined orbit mode, it will notify the Commission pursuant to Section 25.280 of the rules and will update its fuel assessment.

⁶ Telesat Holdings Inc., Annual Report, SEC Form 20F, Item 4, Section D, p. 44, which can be accessed at http://www.sec.gov/Archives/edgar/data/1465191/000114420414011088/v366164_20f.htm.