



Federal Communications Commission  
Washington, D.C. 20554

June 29, 2016

Joseph A. Godles  
Goldberg, Godles, Wiener & Wright, LLP  
1229 Nineteenth Street, NW  
Washington D.C. 20036-2413

Re: Skynet Satellite Corporation  
IBFS File No.: SAT-MOD-20160513-00050  
(Call Sign S2462).

Dear Mr. Godles:

This letter requests additional information regarding Skynet Satellite Corporation's above captioned application to relocate the Telstar 12 satellite (T12) from the 15° W.L. orbital location to the 109.2° W.L. orbital location:

1. In its Technical Exhibit, Skynet states that its TT&C location at Mount Jackson, Virginia, is usable only in a portion of the steerable range indicated in Figures 1 and 2.<sup>1</sup> Consistent with the requirements specified in Sections 25.172(a)(2)-(3) of the Commission's rules, please identify all alternative TT&C locations that will be used in the event that the space station cannot communicate with the Mount Jackson facility.<sup>2</sup>
2. In its Technical Exhibit, Skynet describes two possible beam configurations in which the T12 satellite may operate.<sup>3</sup> Please clarify which of these two configurations Skynet seeks to operate when it commences operations at the 109.2° W.L. location.
3. Section 25.114 of the Commission's rules requires a statement that the space station operator has assessed and limited the probability of the space station becoming a source of debris by collision with large debris or other operational space station.<sup>4</sup> It also requires an assessment of whether there are any known satellites located at, or reasonably expected to be located at, the requested orbital location, or assigned in the vicinity of that location, such that the station keeping volumes of the respective satellites might overlap. If so, the statement must include a statement as to the identities of those parties and the measures that will be taken to prevent collisions.<sup>5</sup> Noting that ViaSat, Inc. has filed an application with the Commission to locate the VIASAT-109W satellite at the 109.1° W.L. orbital location, please state what measures

---

<sup>1</sup> Skynet Satellite Corporation, IBFS File No. SAT-MOD-20160513-00050, Attachment A at 5 (Skynet Application).

<sup>2</sup> 47 CFR § 25.172(a)(2)-(3).

<sup>3</sup> Skynet Application, Attachment A at 1.

<sup>4</sup> 47 CFR § 25.114(d)(14)(iii).

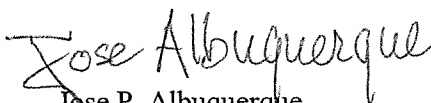
<sup>5</sup> *Id.*

have been taken to facilitate successful coordination of physical operations with this space station.<sup>6</sup>

4. In its Application, Skynet requests a waiver of Footnote NG52 of the U.S. Table of Allocations, for its operations in the 10.95-11.2 GHz and 11.45-11.7 GHz bands.<sup>7</sup> Skynet also states, however, that it will use the downlink bands 10.95-11.2 GHz and 11.45-11.7 GHz in the United States only for international links, *i.e.*, for services between the United States and other countries.<sup>8</sup> Please explain why Skynet requests a waiver of Footnote NG52 if it plans to operate in a manner consistent with the footnote requirements.

The information, and clarifications requested above must be submitted by July 29, 2016. Failure to do so may result in the dismissal of Skynet Satellite Corporation's application pursuant to Section 25.112(c) of the Commission's rules, 47 CFR § 25.112(c).

Sincerely,



Jose P. Albuquerque  
Chief, Satellite Division  
International Bureau

---

<sup>6</sup> ViaSat, Inc., IBFS File No. SAT-LOI-20160208-00015.

<sup>7</sup> Skynet Application, Attachment A at 14; 47 CFR § 2.106, NG52.

<sup>8</sup> Skynet Application, Attachment A at 4.