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FILED ELECTRONICALLY

Mr. Jose P. Albuquerque
Chief, Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Mr. Albuquerque:

This letter responds to the questions set forth in your letter of June 29, 2016 in the above referenced matter relating to the relocation of the Telstar 12 satellite ("T12") from the 15° W.L. orbital location to the 109.2° W.L. orbital location. The responses set forth below are numbered to correspond with the questions as enumerated in your letter:

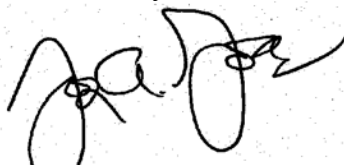
1. If Skynet elects to steer the beams on T12 to a position different from the nominal positions indicated in Attachment A, telemetry, tracking, and control ("TT&C") operations may have to be transferred to a teleport other than Mt. Jackson that is closer to the center of T12's coverage area. TT&C operations would be established at the new teleport prior to the beams being steered, and Skynet would ensure that communication with the spacecraft is maintained at all times. Skynet does not have a specific teleport in mind for this purpose, but will notify the Commission, in accordance with Sections 25.172(a)(2)-(3) of the rules, if one is selected.
2. Skynet initially will be using Configuration 1, as identified in Attachment A. Skynet would like the flexibility, either upon notice to the Commission or (if

required) upon additional request, to switch to the alternate configuration identified in the application (Configuration 2).

3. Skynet has considerable experience in the operation of satellites in adjacent stationkeeping boxes, both with other operators and within the Skynet/Telesat Canada fleet, in order to ensure adequate separation and minimize risk of physical collision. With other operators, Skynet coordinates stationkeeping strategies and exchanges orbit ephemerides on a regular basis to ensure safe separation between the satellites. These procedures would be followed with ViaSat. Skynet already has experience successfully using these procedures to coordinate stationkeeping of satellites operated by different parties that have boxes centered as close as 0.1 degrees apart.
4. In Configuration 1, no waiver of NG52 is required, because the downlink bands 10.95-11.2 GHz and 11.45-11.7 GHz will be used in the United States only for international links, *i.e.*, for service between the United States and other countries. In Configuration 2, however, Skynet believes a waiver of NG52 is required, because there will be transmissions that are uplinked from remote terminals in the United States and are downlinked to a single gateway earth station in the United States in the 10.95-11.2 GHz and 11.45-11.7 GHz bands. It is not possible to downlink these signals to the single U.S. gateway in the conventional Ku-band; Beam B does not have conventional Ku band capability on the downlink.

Please contact me if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Godles', with a stylized flourish at the end.

Joseph A. Godles
*Attorney for
Skynet Satellite Corporation*

cc (via email): Steve Duall
Alyssa Roberts