



File # SAT-STA-20090105-00001

Call Sign _____ Grant Date 01/08/09
(or other identifier)

Term Dates
From 01/08/09 To: period of 90 days

Approved by OMB
3060-0678

Approved: Stephen J. Duall
Stephen J. Duall
Chief, Policy Branch

Date & Time Filed: Jan 5 2009 3:58:42:146PM
File Number: SAT-STA-20090105-00001
Callsign:

*subject to
attached conditions

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:

Request for Temporary Modification of the ISAT List to Reflect Resumed Operations of I3F4 at 54 W.L.

1. Applicant

Name:	Inmarsat plc	Phone Number:	202-248-5155
DBA Name:		Fax Number:	202-248-5186
Street:	99 City Road	E-Mail:	diane_cornell@inmarsat.com
City:	London	State:	
Country:	United Kingdom	Zipcode:	-
Attention:	Ms. Diane J. Cornell		

ATTACHMENT
Provisional Grant:

IBFS File Nos. SAT-STA-20090105-00001¹

Grant Date: January 08, 2009

The request filed by Innarsat plc (Innarsat), IBFS File No. SAT-STA-20090105-00001, IS GRANTED to the extent that earth stations with ISAT as an authorized point of communication will be provisionally permitted to communicate with the Innarsat 3F4 spacecraft operating at the 54.0° W.L. orbital location, $\pm 0.10^\circ$ longitude, for a period of 90 days, subject to the following conditions:

1. This permission shall terminate in the event that a satellite is launched into a location such that its stationkeeping volume would overlap the Innarsat 3F4 satellite's $\pm 0.10^\circ$ degree stationkeeping volume, but would not overlap the Innarsat 3F4 satellite's $\pm 0.05^\circ$ degree stationkeeping volume, unless Innarsat has successfully coordinated its physical operations with those of the other spacecraft.
2. Operations must comply with the terms of any L-band operator-to-operator coordination agreement. In the absence of a continuing L-band operator-to-operator coordination agreement, operations of mobile earth terminals in the 1525-1559 and 1626.5-1660.5 MHz bands will be on a non-harmful interference basis until a future operator-to-operator agreement is concluded. In this instance, Innarsat must notify the other operators in these frequency bands that it will be operating on a non-harmful interference basis.
3. Operations may be subject to additional terms and conditions at the Commission's discretion.
4. This action is without prejudice to action in IBFS File No. SAT-PPL-20090107-00003. This action is based upon a finding that the need for provisional permission is a one-time event occasioned by misunderstandings or miscommunications by, among, and between Innarsat and its resellers, concerning the time frames in which information must be submitted in order to permit action consistent with procedures for amending the ISAT List.

 GRANTED * International Bureau	File # <u>SAT-STA-20090105-00001</u>	Call Sign _____ Grant Date <u>01/08/09</u> (or other identifier)
	From <u>01/08/09</u> To: <u>Period of 90 days</u>	Term Dates
* Subject to conditions	Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Policy Branch	

¹ The application, although filed as a request for Special Temporary Authority (STA), appears to be a request for a declaratory ruling concerning the ISAT List. Accordingly, we are treating the request as such and retaining it on file, although the required fee for an STA was not submitted.

2. Contact

Name:	John P. Janka	Phone Number:	202-637-2200
Company:	Latham & Watkins LLP	Fax Number:	202-637-2201
Street:	555 Eleventh Street, NW Suite 1000	E-Mail:	john.janka@lw.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20004 -
Attention:	Mr. John P. Janka	Relationship:	Legal Counsel

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number or Submission ID

4a. Is a fee submitted with this application?

- ☐ If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- ☐ Governmental Entity ☐ Noncommercial educational licensee
- ☒ Other (please explain): NO FEE REQUIRED — PDR-RELATED FILING

4b. Fee Classification CRY – Space Station (Geostationary)

5. Type Request

- ☐ Change Station Location ☐ Extend Expiration Date ☒ Other

6. Temporary Orbit Location
54 W.L.

7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

See Exhibit A.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes. ☒ Yes ☐ No

10. Name of Person Signing
Alison Horrocks

11. Title of Person Signing
Company Secretary

12. Please supply any need attachments.

Attachment 1: Exhibit A

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to jboley@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Inmarsat plc
Request for Temporary Modification of the ISAT List
Exhibit A

Description of Request

Inmarsat plc (“Inmarsat”) hereby requests that the Commission modify the “ISAT List,” on a temporary basis, to reflect the resumed operations of the Inmarsat 3F4 satellite (the “I3F4” satellite) at the Atlantic Ocean Region (West) location of 54° W.L., where this satellite operated until the Spring of 2006. I3F4 is currently being relocated from 142° W.L. back to 54° W.L., where it will operate under the same technical parameters, and provide the same types of “existing and evolved” Inmarsat services, as were authorized before at this very location.¹

Inmarsat is requesting a temporary modification of the ISAT List in order to (i) ensure the uninterrupted provision of Inmarsat services to, from, and within the United States as Inmarsat reconfigures its in-orbit fleet, and (ii) obviate the need for each separate holder of a Commission earth station license to seek new or continued authority to communicate with I3F4 at 54° W.L.² Inmarsat also is preparing a petition for declaratory ruling to seek permanent modification of the ISAT List to reflect resumed operations of I3F4 at 54° W.L., which Inmarsat anticipates filing next week. Inmarsat will submit along with that petition any pertinent technical information regarding I3F4 that is not already on file in a format compatible with the Commission’s databases.³

Grant of the requested temporary modification of the ISAT List would serve the public interest by ensuring the uninterrupted provision of Inmarsat services to, from, and within the United States as Inmarsat reconfigures its in-orbit fleet. Further, the public interest findings underlying the I3F4 satellite’s existing market access and ISAT List placement remain fully applicable with respect to the 54° W.L. orbital location where the spacecraft is resuming operations. Therefore, the requested temporary modification of the ISAT List to reflect the relocation of the I3F4 satellite is consistent with the Commission’s conclusion that the ISAT List “will serve the public interest by eliminating duplicative and repetitive filings and by facilitating the more rapid deployment of satellite services to U.S. consumers.”⁴

Accordingly, Inmarsat respectfully requests that the Commission temporarily modify the ISAT List for thirty (30) days, beginning January 7, 2009, to reflect the resumed operations of the I3F4 satellite at the 54° W.L. nominal orbital location.

¹ See *Comsat Corporation*, Memorandum Opinion, Order and Authorization, 16 FCC Rcd 21611 (2001). The ISAT List references this same decision as the source of technical information for the currently authorized operations of I3F2 at 15.5° W.L. and I3F3 at 178° E.L. See *ISAT List*, available at <http://www.fcc.gov/ib/sd/se/isat.html> (last visited Jan. 5, 2009). See also *Inmarsat, Inc. Request to Streamline Licensing of L-Band Mobile-Satellite Service Terminals Using Inmarsat Satellites as Points of Communication*, Order, DA 08-2323, Appendix (Oct. 20, 2008) (“*ISAT List Order*”).

² See *ISAT List Order* at ¶ 1.

³ Technical parameters reflecting the previous operations at 142° W.L. are on file in IB File No. SES-MFS-20071011-01413 (granted Feb. 20, 2008).

⁴ *ISAT List Order* at ¶ 1.