REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Skynet Satellite Corporation ("Skynet"), pursuant to Section 25.120 of the Commission's Rules, hereby requests special temporary authority ("STA") for 30 days, commencing on May 19, 2016, to relocate Telstar 12 (call sign S2462) from 15° WL to 109.2° WL. During the relocation, T12's communications payload will be turned off and Skynet will operate only T12's telemetry, tracking, and command ("TT&C") payload on 11.4505 and 14.499 GHz.

At present, Telstar12 is operating in inclined orbit mode at 15° WL.[1] Skynet will be filing an application in the near future to provide U.S. service via Telstar 12 from 109.2° WL pursuant to an inter-administration arrangement between the United States and Canada, once the relocation has been completed.[2]

Skynet's STA request is supported by good cause. The traffic that had been on Telstar 12 has been offloaded to Telstar 12V, a replacement satellite that was launched on November 24, 2015, and is co-located with Telstar 12.[3] Relocating Telstar 12 to 109.2° WL will enhance competition and consumer choice by making it possible, subject to grant of the Telstar 12 U.S. service application, for Skynet to provide service from an additional orbital location.

Relocating Telstar 12 from 15° WL to 109.2° WL, moreover, will be consistent with the Commission's requirements for avoiding harmful interference and guarding against orbital debris. Skynet will coordinate with potentially affected satellite operators to ensure that Telstar 12's TT&C signals will not interfere with their networks during the relocation. In any event, Telstar 12's TT&C communications pursuant to the STA requested herein will be on a secondary, non-interference basis.

In addition, during its drift Telstar 12 will be physically separated from active geostationary satellites, using an orbit that is approximately 150 km above the geostationary satellite orbit. Skynet will continue to employ all the safeguards in place for its satellites that are on station. It will notify MIT's Lincoln Laboratories and JsPOC of the drift and updated orbital parameters. Skynet also will obtain updated information on other space objects from Lincoln Laboratories and JsPOC, and any close approaches will be analyzed using this data and automated processing. Evasive action will be taken if required to minimize risk of collision.

Footnote NG52 of the U.S. Table of Allocations (formerly footnote NG103) limits operations on the 11.4505 GHz frequency Skynet will be using during Telstar's 12's drift to international services.[4] It is unclear whether this requirement applies to operations pursuant to the proposed STA, which will be on a secondary, non-interference basis rather than on the primary basis provided for in the Table of Allocations. To the extent needed, however, Skynet

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[1] *See* Letter to Ms. Marlene H. Dortch from Joseph A. Godles, Esq. regarding Notice of Inclined Orbit Mode of Telstar 12 pursuant to 47 CFR §25.280, filed on April 27, 2016.

[2] Skynet also will be filing an STA request to cover the portion of the relocation period that extends beyond the initial 30 days. The relocation will take approximately 50 days, based on a drift rate of two degrees/day.

[3] On May 11, 2015, the International Bureau granted Skynet's application to launch and operate Telstar 12V as a replacement for Telstar12. *See* FCC File No. SAT-LOA-20141010-00107.

[4] *See* 47 C.F.R. § 2.106, footnote NG52.

respectfully requests a waiver of NG52. Grant of a waiver would be consistent with precedents in which the Commission has waived NG52/NG103 because: (1) the footnote is intended to prevent a proliferation of earth stations in the affected bands; and (2) only a limited number of earth stations in the affected bands had been proposed.[5] In this case, Skynet will operate only a single TT&C earth station in the affected bands.

Accordingly, and for good cause shown, Skynet respectfully requests that its STA request be granted.

[5] *See, e.g., EchoStar KuX Corporation*, Order and Authorization, DA 04-3162 (Sept. 30, 2004), ¶¶ 14-17 (EchoStar granted a waiver of NG104 permitting it to operate a single TT&C station in the United States).