

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Skynet Satellite Corporation (“Skynet”), pursuant to Section 25.120 of the Commission’s Rules, hereby requests a 30-day extension of special temporary authority (“STA”) 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.

Skynet previously filed an initial request for an STA for thirty (30) days to move Telstar 12 from 15° WL to 109.2° WL.¹ It is anticipated, however, that the relocation will last approximately fifty (50) days. Skynet, therefore, is seeking an STA to cover the portion of the relocation that is not covered by its initial STA request. Out of an abundance of caution, moreover, Skynet is seeking a 30-day extension, rather than a 20-day extension, to provide for unexpected contingencies.

Skynet requests that its 30-day STA extension run from the expiration of its initial STA. That date is unknown at this time, because Skynet’s initial STA request is pending. Skynet also will be filing an application to provide U.S. service via Telstar 12 from 109.2° WL pursuant to an inter-administration arrangement between the United States and Canada.

Skynet’s STA extension request is supported by good cause. As outlined in its initial STA request, the traffic that had been on Telstar 12 has been offloaded to Telstar 12V which operates at the 15° WL position previously occupied by T12. 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.

¹ File No. SAT-STA-20160510-00046.

As detailed in its initial STA request, Skynet respectfully requests a waiver of Footnote NG52 of the U.S. Table of Allocations (formerly footnote NG103). That footnote limits to international services² operations on the 11.4505 GHz frequency Skynet will be using during Telstar 12's drift. 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 respectfully requests a waiver.

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.³ 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 extension request be granted.

² See 47 C.F.R. § 2.106, footnote NG52.

³ 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).