## 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") to modify the beam configuration of Telstar 12 in the manner set forth in Skynet's contemporaneously-filed space station modification application (the "Beam Reconfiguration Modification Application"). Skynet requests STA for a period of sixty (60) days commencing on September 22, 2017.

In a previous modification application seeking authority to relocate Telstar 12 to 109.2° W.L. (the "Relocation Modification Application")², where Telstar 12 is presently stationed, Skynet identified two possible spot-beam configurations. The International Bureau requested that Skynet choose a single configuration for licensing purposes, and Skynet selected Configuration 1. The International Bureau granted the Relocation Modification Application on that basis.

To satisfy evolving customer requirements, Skynet now needs to operate Telstar 12 in Configuration 2. To implement this change, Skynet has filed the Beam Reconfiguration Modification Application. In light of the requirements for public notice and comment, however, there is insufficient time for the Beam Reconfiguration Modification Application to be processed and granted by the September 22 start date for initiation of service in Configuration 2. Skynet, therefore, is requesting STA covering operation in Configuration 2 during an initial 60-day period.

Skynet's STA request is supported by good cause. The new spot-beam configuration will enable Skynet's customer to provide broadband Internet connectivity and streaming audio/video services on commercial aircraft flying within Telstar 12's coverage area. By facilitating provision of this service in a timely manner, grant of Skynet's STA request will increase consumer choice and enhance competition.<sup>3</sup>

The changes proposed in the STA request, moreover, will have no impact on the potential for interference. The showings Skynet made in the Relocation Modification Application as to compatibility with adjacent GSO FSS satellites and compliance with FCC and ITU limits for power flux density already took both Telstar 12 configurations into account and are unchanged.<sup>4</sup>

<sup>&</sup>lt;sup>1</sup> Skynet Satellite Corporation, application to modify spot-beam configuration of Telstar 12 (S2462), Submission ID: IB2017002382, filed August 24, 2017.

<sup>&</sup>lt;sup>2</sup> See Skynet Satellite Corporation, application to modify S2462 to provide U.S. service via Telstar 12 from 109.2° WL pursuant to an inter-administration arrangement between the United States and Canada, Exhibit A, SAT-MOD-20160513-00050, filed May 13, 2016.

<sup>&</sup>lt;sup>3</sup> As stated in the Beam Reconfiguration Modification Application, Skynet's operations in the Extended-Ku band (10.95-11.2 and 11.45-11.7 GHz) using Configuration 2 will be limited to: (1) international links; and (2) ESV, VMES, and ESAA links that are operated in accordance with footnote NG52 of the Table of Frequency Allocations. Skynet, therefore, is not seeking a waiver of footnote NG52.

<sup>&</sup>lt;sup>4</sup> See Relocation Modification Application, Attachment A (Technical Exhibit).

In any event, consistent with the Commission's policies Skynet's operations pursuant to the requested STA will be on a secondary, non-interference basis.

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