

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Skynet Satellite Corporation (“Skynet”), pursuant to Section 25.120 of the Commission’s Rules,¹ hereby requests special temporary authority (“STA”) for a period of 30 days to allow it to increase the station keeping tolerance of its Telstar 12 satellite (“T12”), located at 109.2° W.L.,² from the current $\pm 0.50^\circ$ to $\pm 0.10^\circ$.

Skynet’s request is supported by good cause. As set forth below, Skynet can maintain a safe flight profile using the proposed station keeping tolerance, which will lengthen the time during which Skynet is able to provide service via T12.

Section 25.210(j) of the Commission’s rules³ requires satellite operators to maintain station keeping within $\pm 0.05^\circ$ of their assigned orbital longitude in the east/west direction, unless specifically authorized by the Commission to operate with a different longitudinal tolerance. On multiple occasions, the Commission has permitted an increased station keeping tolerance based on a finding that doing so would not adversely affect the operations of other spacecraft and would have benefits such as conserving fuel for future operations.⁴ These grants have been subject to a condition that authority to operate with the larger tolerance shall terminate in the event a satellite is launched into a location such that its station keeping volume would overlap a satellite’s ± 0.10 degree station keeping volume, but would not overlap a $\pm 0.05^\circ$ degree station keeping volume, unless the satellite operator has successfully coordinated its physical operations with those of the other spacecraft.⁵ Telesat has no objection to a similar condition.

Telesat’s proposal is consistent with these precedents. If T12 operates with a $\pm 0.10^\circ$ tolerance, it will come no closer than 0.6° to its nearest neighbors, EchoStar 10 and EchoStar 11.⁶ There will be an even greater separation with the next closest neighbor, MSAT-1, which is controlled by Skynet’s parent, Telesat. Moreover, Skynet provides orbital data to the CSpOC and the Space Data Association to maintain space situational awareness and receives close approach warnings from the CSpOC when warranted.

¹ 47 CFR §25.120.

² Skynet Satellite Corporation, Call sign S2462, IBFS File No. SAT-MOD-20171106-00150, granted Mar 8, 2018.

³ 47 CFR §25.210(j).

⁴ See, e.g., *SES Americom, Inc. Application for Modification of Satcom SN-4 Fixed Satellite Space Station License*, 20 FCC Rcd 11542, 11545 (Sat. Div. 2005).

⁵ See e.g. ISAT List, updated May 14, 2015, available at <https://www.fcc.gov/isat-list> (multiple waivers for Inmarsat 3F and 4F satellites).

⁶ The closest separation will occur when T12 and either of the other satellites are simultaneously at the closet edges of their respective station keeping boxes.

Furthermore, grant of Skynet's request is in the public interest as it will allow T12 to operate longer and more efficiently. Authorizing the proposed station keeping area will enable Skynet to maximize spacecraft life and fuel, thereby extending the time during which service can be provided. Assuming Skynet's initial 30-day STA is extended, Skynet estimates an additional six months of service could be provided. Moreover, given that T12 is currently operating in inclined orbit,⁷ the additional proposed east-west movement is small relative to the north-south daily motion and will not impact services that utilize tracking antenna systems.

Accordingly, and for good cause shown, Skynet's STA request should be granted.

⁷ [cite to inclined orbit notification]