



File # SAT-STA-20190830-00086

Call Sign S2462 Grant Date 09/05/19

(or other identifier)

From 09/05/19 Term Dates period of To: 30 days

Approved: Stephen J. Duall

Approved by OMB 3060-0678

Date & Time Filed: Aug 30 2019 10:46:27:393AM
File Number: SAT-STA-20190830-00086
Callsign:

*with conditions

Stephen J. Duall
Chief, Satellite Policy Branch


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:
T12 station keeping

I. Applicant
Name: Skynet Satellite Corporation Phone Number: 613-748-8700
DBA Name: Fax Number:
Street: 135 Route 202/206 E-Mail: eneasmith@telesat.com
City: Bedminster State: NJ
Country: USA Zipcode: 07921
Attention: Ms Elisabeth Neasmith

ATTACHMENT TO GRANT
 Skynet Satellite Corporation
 IBFS File No. SAT-STA-20190830-00086

IBFS File No(s):	SAT-STA-20190830-00086	<p>GRANTED – With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	Skynet Satellite Corporation	
Call Sign:	S2462	
Satellite Name:	Telstar 12	
Orbital Location: (required station-keeping tolerance)	109.2° W.L. (± 0.10 degrees east/west)	
Administration:	United States of America	
Nature of Service:	Fixed-Satellite Service (FSS)	
Scope of Grant:	Skynet is granted special temporary authority for 30 days, to increase the east/west station keeping tolerance of the Telstar 12 space station at the 109.2° W.L. orbital location to ±.10 degrees.	
Service Area(s):	United States, Caribbean, Central America, South America. <i>See</i> Schedule S and accompanying .gxt files. <i>See</i> IBFS File No. SAT-MOD-20160513-00050.	
Frequencies:	10.95-11.2 GHz (space-to-Earth) 11.45-11.7 GHz (space-to-Earth) 13.75-14.0 GHz (Earth-to-space) 14.0-14.5 GHz (Earth-to-space)	

Operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission’s rules not waived herein. This grant is also subject to the following conditions:

1. Except as provided in this special temporary authority, all other operations of Telstar 12 are pursuant to the parameters set forth in IBFS File No. SAT-MOD-20160513-00050.¹
2. Skynet is granted a waiver of section 25.210(j) of the Commission's rules, 47 CFR. § 25.210(j). Section 25.210(j) requires geostationary space stations to be “be maintained within 0.05° of their assigned orbital longitude in the east/west direction, unless specifically authorized by the Commission to operate with a different longitudinal tolerance.” Skynet proposes to operate Telstar 12 at the 109.2° W.L. orbital location with an east-west station-keeping tolerance of ±0.10 degrees. Skynet states that with a ±0.10° tolerance it will come no closer than .6° to the closest satellites, EchoStar 10 and EchoStar 11, and will have an even greater separation to the next closest satellite, MSAT-1 which is controlled by Skynet’s parent, Telesat. Skynet also states that allowing Telstar 12 to operate with an increased station-keeping volume will enable Skynet to maximize the spacecraft’s life and fuel, extending the time service may be provided by approximately six months. The operations permitted by this temporary authority shall terminate in the event that a satellite is launched into a location such that its station-keeping volume would overlap Telstar 12’s ±0.10 degree station-keeping volume, but would not overlap Telstar 12’s ±0.05 degree station-keeping volume, unless Skynet has successfully coordinated Telstar 12’s physical operations with those of the other spacecraft.
3. Any action taken and expense incurred as a result of operations pursuant to this grant of special authority is at Skynet’s own risk.

Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.

¹ Skynet Satellite Corporation, IBFS File No. SAT-MOD-20171106-00150 (granted March 8, 2018).

ATTACHMENT TO GRANT
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This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 CFR § 0.261, and is effective upon release.

Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).

Action Date:	September 5, 2019
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Term Dates	From: September 5, 2019	To: period of 30 days
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Approved:


Stephen J. Duall
Chief, Satellite Policy Branch

2. Contact

Name:	Joseph A. Godles	Phone Number:	202-429-4900
Company:	Goldberg, Godles, Wiener & Wright LLP	Fax Number:	
Street:	1025 Connecticut Ave, NW Ste 1000	E-Mail:	jgodles@g2w2.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20036 -
Attention:		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):

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

5. Type Request

- Change Station Location Extend Expiration Date Other

6. Temporary Orbit Location

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.)

STA to permit waiver of station keeping rules to allow for a separation tolerance of +/- 0.10 deg.

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
Elisabeth Neasmith

11. Title of Person Signing
Director, Spectrum Management & Development

12. Please supply any need attachments.

Attachment 1: Attachment 1

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

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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.

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]