

## REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

Skynet Satellite Corporation ("Skynet"), pursuant to Section 25.120 of the Commission's Rules,<sup>1</sup> hereby requests a 180-day extension of its special temporary authority ("STA")<sup>2</sup> permitting Skynet to operate its Telstar 12 satellite ("T12"), located at 109.2° W.L.,<sup>3</sup> with an increased station keeping tolerance  $\pm 0.10^\circ$ .

Skynet will continue to accept and operate under the conditions set forth in its latest STA request. The technical characteristics and statements made thereto remain unchanged. Moreover, Skynet agrees it will terminate operations under its STA in the event a satellite is launched into a location such that T12's station keeping volume would overlap a satellite's  $\pm 0.10$  degree station keeping volume, but would not overlap a  $\pm 0.05^\circ$  degree station keeping volume, unless Skynet has successfully coordinated its physical operations with those of the other spacecraft.<sup>4</sup>

Under present conditions, this condition should not come into play. When T12 operates with a  $\pm 0.10^\circ$  station keeping tolerance, it will come no closer than  $0.6^\circ$  to its nearest neighbors, EchoStar 10 and EchoStar 11.<sup>5</sup> There will be an even greater separation with the next closest neighbor, MSAT-1, which is controlled by Skynet's parent, Telesat.

Grant of Skynet's request is in the public interest as it will allow T12 to maximize spacecraft life and fuel, thereby extending the time during which service can be provided. Given that T12 is currently operating in inclined orbit,<sup>6</sup> 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 extension request should be granted.

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<sup>1</sup> 47 CFR §25.120.

<sup>2</sup> See *Stamp Grant*, Skynet Satellite Corporation, IBFS File No. SAT-STA-20190830-00086, granted Sept. 5, 2019; see also extension by *Stamp Grant*, Skynet Satellite Corporation, IBFS File No. SAT-STA-20190911-00089, granted Oct. 5, 2019 ("*Skynet Station-keeping STA*").

<sup>3</sup> Skynet Satellite Corporation, call sign S2462, IBFS File No. SAT-MOD-20171106-00150, granted Mar. 8, 2018.

<sup>4</sup> See *Skynet Station-keeping STA*, condition 2.

<sup>5</sup> 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.

<sup>6</sup> See letter, dated April 19, 2016, from Joseph A. Godles, attorney for Skynet, to Marlene H. Dortch, Secretary, FCC.