

APPLICATION FOR SPECIAL TEMPORARY AUTHORITY

Ligado Networks Subsidiary LLC (“Ligado”), pursuant to Section 25.120 of the Commission’s Rules, hereby requests an extension of a special temporary authority (“STA”)¹ to conduct telemetry, tracking, and command (“TT&C”) communications with MSAT-2 (AMSC-1) at 107.5° WL during the pendency of its application to modify MSAT-2’s authorization to relocate from 106.5° WL to 107.5° WL (“MSAT-2 Modification Application”).² Ligado requests that the Commission extend the April STA an additional 60 days, commencing on May 19, 2021 and ending on July 18, 2021.

Ligado commenced the drift from MSAT-2’s previous location at 106.5° to 107.5° on April 21, 2021, and completed the maneuver on April 29, 2021. The move was successfully completed with all systems performing as expected. Ligado will, however, need to continue conducting TT&C communications with the satellite while the Commission considers the MSAT-2 Modification Application. As such, the following repeats information from the April STA application relevant to ongoing operations at the new orbital location.

MSAT-2 serves as a backup satellite to Ligado’s other U.S. satellite, SkyTerra-1, and, as a backup satellite, does not currently carry customer traffic. The orbital location MSAT-2 at 107.5° WL is an orbital position under Canadian authority, and Innovation, Science & Economic Development Canada (“ISED”) has authorized operations at the location.³ As noted in the MSAT-2 Modification, Ligado has requested that the Commission indicate to ISED that it consents to relocating MSAT-2 to 107.5° WL.⁴ Please also note that while MSAT 2 will be authorized in the nominal Canadian orbital slot at 107.3°WL it will be physically located and operate at 107.5° WL in order to avoid overlapping with the Anik-F1R and Anik G-1 satellites, which Telesat has confirmed have station-keeping operations within a 0.05° tolerance.

Grant of this application is entirely consistent with the Commission’s policy of granting Special Temporary Authority when doing so will not cause harmful interference and will serve the public interest, convenience and necessity.⁵ There is no risk of harmful interference from MSAT-2 operating in the new location. As MSAT-2 and MSAT-1 were built to the same design specifications, MSAT-2’s operating characteristics and interference envelope are

¹ See FCC File No. SAT-STA-20210406-00046 (granted Apr. 19, 2021) (“April STA”).

² See FCC File No. SAT-AMD-20210412-00049 (filed Apr. 12, 2021); see also FCC File No. SAT-MOD-20210316-00034 (filed Mar. 16, 2021).

³ See Letter from Jeffrey Carlisle, Counsel to Ligado to Marlene H. Dortch, Secretary, FCC, April STA (filed Apr. 16, 2021).

⁴ See ITU, Radiocommunication Bureau, *WRC-12 decisions included in the Minutes of Plenary meeting relating to space services procedures*, Circular Letter CR/333 (2012) at 2 (citing (§3.12 Doc. CMR12/554); see also ITU, Radiocommunication Bureau, *Decisions of past WRCs concerning the application of the Radio Regulations*, Circular Letter CR/380 (2015) at 3 (same).

⁵ See e.g., *Newcomb Communs., Inc.*, 8 FCC Rcd 3631, 3633 (1993); *Columbia Comms. Corp.*, 11 FCC Rcd. 8639, 8640 (1996); *Am. Tel. & Tel. Co.*, 8 FCC Rcd 8742 (1993).

identical to those of MSAT-1,⁶ which has operated in that location without causing any harmful interference to other operators. Moreover, L-Band operation has already been coordinated with other L-band operators assuming use by a MSAT-class satellite. Thus, placement of MSAT-2 will not create any new interference risk that has not already been discussed and resolved by the relevant operators. The MSAT-2 Modification Application provides further information substantiating the absence of any risk of harmful interference.⁷ The public interest, convenience and necessity is served because relocation will facilitate Ligado's continued efficient management of its satellites and orbital locations, and will also preserve the availability of backup service at an orbital location that Ligado has operated from for many years, thus helping to ensure continuity of service to its customers.

With regard to MSAT-2's east-west station keeping range, MSAT-2 has adopted an increasingly inclined orbit, which will continue to increase for several years after relocation to the new orbital location. Accordingly, to provide necessary flexibility for expected operations for the next five years and to extend MSAT-2 remaining fuel life, Ligado requested in the MSAT-2 Modification Application to change the north-south station-keeping range to +/-13.5 degrees and, pursuant to 47 C.F.R. §25.201(j), requested that the Commission authorize a change to the east-west station-keeping range to +/-0.1 degrees.

As explained in the MSAT-2 Modification Application,⁸ these ranges will not result in any overlap with any neighboring satellites. Ligado has also reviewed planned satellites and determined that there will be no overlap with the nearest planned satellites, none of which will be placed into orbit through the duration of the extension requested.

Because the initial STA expired on May 19, Ligado apologizes for filing after expiration, and respectfully requests a waiver of 47 C.F.R. § 25.120(a) and is filing this application on a *nunc pro tunc* basis. As Ligado planned to (and did) file a request for regular authority for service at 107.5° WL, the original STA was grantable for a period not to exceed 60 days, rather than just 30.⁹ Moreover, there is no harm resulting from granting the requested waiver: (1) no party has been prejudiced by Ligado's late filing of this STA extension; (2) the maneuver contemplated by the original STA has already been completed; (3) MSAT-2's operations and stationkeeping present no threat to any other operator; (4) as MSAT-2 continues to be used as a backup, it is not actively using the service links from the new location during pendency of the MSAT-2 Modification Application; and (5) as an additional safeguard, ISED has separately authorized operations at the new location. In the absence of any harm, and the Commission's continued review of the MSAT-2 Modifications Application, there is good cause to grant the requested waiver.

Accordingly, and for good cause shown, Ligado respectfully requests that its requests

⁶ MSAT-2 does differ from MSAT-1 in only one respect: MSAT-2 uses 11.7005 GHz as a backup TT&C frequency, while MSAT-1 used 11.70275 GHz as a backup. This difference is not material, however, to interference with any other operator.

⁷ See MSAT-2 Modification Application, Exhibit C, 3-6 and Technical Exhibit.

⁸ See *id.*, Exhibit C, 2-3.

⁹ 47 C.F.R. § 25.120(b)(3).

for an STA and waiver of 47 C.F.R. § 25.120(a) be granted.