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Approved by OMB
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Request for Extension of Special Temporary Authority

1. Applicant

Name:	Space Imaging LLC	Phone Number:	303-254-2151
DBA Name:		Fax Number:	303-254-2214
Street:	12076 Grant Street	E-Mail:	ssmith@spaceimaging.com
City:	Thornton	State:	CO
Country:	USA	Zipcode:	80241 -3102
Attention:	Mr Scott Smith		



File # SES-STA-20050207-00151

Call Sign E060463 Grant Date 2/10/05
(or other identifier)

Term Dates
From 2/9/05 To 4/9/05

Approved: Sydney

* See attachment for conditions.

2. Contact

Name:	Raymond G. Bender, Jr.	Phone Number:	202-776-2758
Company:	Dow, Lohnes & Albertson, pllc	Fax Number:	202-776-2222
Street:	1200 New Hampshire Ave	E-Mail:	RBender@DLALAW.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20036 -6802
Contact Title:	Attorney	Relationship:	Legal Counsel

3. Reference File Number SESMOD2004060700809

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 CGX – Fixed Satellite Transmit/Receive Earth Station

5. Type Request

- Use Prior to Grant Change Station Location Other

6. Requested Use Prior Date
02/09/2005

7. City Norman

8. Latitude
(dd mm ss.s h) 35 10 47.2 N

9. State OK	10. Longitude (dd mm ss.s h) 97 33 59.3 W
11. Please supply any need attachments. Attachment 1: Attachment 1 Attachment 2: Attachment 3:	
12. 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.) <div style="border: 1px solid black; padding: 5px; margin: 10px 0;">This application seeks an extension of an existing Special Temporary Authority (STA) issued December 9, 2004, authorizing Space Imaging's earth station at Norman, OK, to communicate (on a receive-only basis) with India's ResourceSat-1 remote-sensing satellite during the pendency of an FCC Form 312 license modification application for the same purpose.</div>	
13. 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. <input checked="" type="radio"/> Yes <input type="radio"/> No	
14. Name of Person Signing Scott Smith	15. Title of Person Signing Executive VP, Satellite Access Systems
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).	

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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 of Space Imaging LLC for Extension of Special Temporary Authority

Space Imaging LLC (“Space Imaging”) hereby requests an extension of an existing Special Temporary Authorization (“STA”) to permit Space Imaging to continue to receive remotely-sensed imagery data from India’s ResourceSat-1 satellite at Space Imaging’s earth station in Norman, Oklahoma (Call Sign E960463). Grant of this STA extension will serve the public interest by allowing Space Imaging to continue current operations and customer service pending FCC action on Space Imaging’s FCC Form 312 license modification application which seeks permanent authority to communicate with the ResourceSat-1 satellite.

I. Background

On June 7, 2004, Space Imaging filed a license modification application on FCC Form 312 to add the ResourceSat-1 satellite as a new point of communication (on a receive-only basis) at the Norman earth station (File No. SES-MOD-20040607-00809). That underlying application remains pending at this time.¹

On December 6, 2004, Space Imaging filed an STA application for authority to communicate with the ResourceSat-1 satellite during the pendency of its application for permanent authority. Space Imaging noted in its STA request that the proposed X-band operations had been fully coordinated with the National Telecommunications and Information Administration (“NTIA”). Space Imaging further observed that no objections had been filed with respect to Space Imaging’s underlying FCC Form 312 license modification application following public notice of that application. On December 9, 2004, the Commission granted Space Imaging’s STA application for a term of sixty (60) days, *i.e.*, until February 9, 2005.

Because the Commission has not yet acted on Space Imaging’s FCC Form 312 license modification application, and the STA authorizing communications with ResourceSat-1 is about to expire, Space Imaging is seeking an extension of its STA so that there will be no interruption to Space Imaging’s current remote-sensing operations and customer service.

II. Grant of this STA Extension Will Serve the Public Interest

The STA extension requested herein will serve the public interest. Indeed, the grant of an extension is necessary and appropriate for the same reasons the Commission found the initial STA request to be justified. We will not repeat in detail each of the

¹ Space Imaging also filed, on June 7, 2004, a separate FCC Form 312 license modification application to receive remotely-sensed imagery data from the ResourceSat-1 satellite at another Space Imaging earth station in Fairbanks, Alaska, and that application also remains pending.

supporting facts and circumstances set out in the earlier STA request, but those factors may be summarized as follows:²

First, Space Imaging needed immediately to commence communications with ResourceSat-1 as the designated replacement satellite for Indian remote-sensing satellites IRS-1C and IRS-1D. Space Imaging had been communicating with each of those satellites pursuant to prior FCC authorizations. However, as explained in the earlier STA application, the IRS-1C satellite is no longer able to provide service in North America, and Space Imaging therefore was forced to discontinue communications between its U.S. ground stations and the IRS-1C satellite. Considering Space Imaging's reliance on the two Indian remote-sensing satellites (IRS-1C and IRS-1D), the loss of IRS-1C service represented a 50 percent reduction in earth coverage capacity. Moreover, the IRS-1D satellite had begun experiencing anomalies and the satellite's deterioration has adversely affected the quality of service provided to Space Imaging by that satellite. For these reasons, it was critical for Space Imaging immediately to commence communications with ResourceSat-1 as the designated replacement satellite for IRS-1C and IRS-1D.

Second, the ResourceSat-1 satellite has vastly improved data quality over the previously-authorized Indian satellites IRS-1C and IRS-1D, and the commencement of service with this new satellite afforded new and improved remote-sensing applications for commercial and government users alike.

Third, for reasons explained in the earlier STA application, the commencement of communications with ResourceSat-1 helped to foster ongoing cooperation and harmonious relations between the U.S. and Indian interests (both commercial and government) in the field of remote-sensing.

Finally, as noted in the prior STA application, the proposed operations have been fully coordinated with NTIA, and no technical issues prevented a grant of this relatively straightforward receive-only proposal, nor do any technical issues prevent an extension of this STA. Space Imaging further noted that a grant of the STA would address Space Imaging's immediate need to commence communications with the ResourceSat-1 satellite, while at the same time permitting the Commission to address any remaining processing issues surrounding Space Imaging's FCC Form 312 license modification application in the ordinary course.

Each of these public interest factors supports an STA extension to permit Space Imaging to continue receiving remotely-sensed imagery data from the ResourceSat-1 satellite at its Norman, Oklahoma earth station. Moreover, grant of an STA extension will avoid interruption of critical remote-sensing satellite services on which Space Imaging and its commercial and government customers have come to rely.

² The facts and circumstance supporting the initial STA were set out in Attachment 1 to Space Imaging's prior STA application filed December 6, 2004.

Considering the foregoing, Space Imaging respectfully submits that grant of this STA extension request would serve the public interest.

In accordance with Section 25.120 of the rules, a copy of this request for STA extension is being forwarded to the Commission's Columbia Operations Center in Columbia, Maryland.

**FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

February 9, 2005

STA No: SES-STA-20050207-00151
Call Sign: E060463

- 1) Space Imaging LLC (Space Imaging) is authorized to receive remotely-sensed data and imagery from Indian-licensed ResourceSat-1 in the 8072.5-8177.5 MHz and 8247.5-8352.5 MHz bands with bandwidths of 105 MHz, in accordance with the terms, conditions, and technical specifications set forth in its application, this attachment and the Commission's Rules.
- 2) All expenses for operation shall be at Space Imaging's own risk.
- 3) Harmful radio interference shall not be caused to any other lawfully operated radio station and satellite, and operation shall cease immediately upon notification of interference. Complaints of all radio interference shall be forwarded immediately to the Commission, in writing.