

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:  
STA to conduct testing on earth station prior to deployment with waiver.

I. Applicant

<b>Name:</b>	PetroCom License Corporation	<b>Phone Number:</b>	504-736-9400
<b>DBA Name:</b>		<b>Fax Number:</b>	504-734-6100
<b>Street:</b>	5901 Earhart Expressway	<b>E-Mail:</b>	jdenton@petrocom.com
<b>City:</b>	Harahan	<b>State:</b>	LA
<b>Country:</b>	USA	<b>Zipcode:</b>	70123 -
<b>Attention:</b>	Mr. Jon Denton		



File # SES-STA-20060224-00299

Call Sign E050131 Grant Date 2/28/06  
(or other identifier)

From 2/25/06 Term Setup To 3/31/06

Approved: Jeannette D. Spriggs

**2. Contact**

<b>Name:</b>	Russell H. Fox	<b>Phone Number:</b>	202-434-7483
<b>Company:</b>	Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.	<b>Fax Number:</b>	202-434-7400
<b>Street:</b>	701 Pennsylvania Avenue, NW Suite 900	<b>E-Mail:</b>	RFox@mintz.com
<b>City:</b>	Washington DC	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20004 -
<b>Attention:</b>	Russel H. Fox	<b>Relationship:</b>	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 SESSTA2005121901772 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 CGX - Fixed Satellite Transmit/Receive Earth Station

5. Type Request

Use Prior to Grant

Change Station Location

Other

6. Requested Use Prior Date

02/25/2006

7. CityEngleside	8. Latitude (dd mm ss.s h) 27 51 28.08 N	
9. State TX	10. Longitude (dd mm ss.s h) 19 12 2.0 W	
11. Please supply any need attachments. Attachment 1: Justification                      Attachment 2: Waiver                      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: 5px 0;">STA to conduct testing prior to deployment in the Gulf of Mexico and request for Waiver.</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 Jon Denton	15. Title of Person Signing Engineering Manager	
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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**Attachment 1**  
**PetroCom License Corporation**  
**Application for Earth Station Special Temporary Authority**

**JUSTIFICATION FOR SPECIAL TEMPORARY AUTHORITY**

PetroCom License Corporation ("PetroCom"), pursuant to the provisions of Section 25.120 of the rules and regulations of the Federal Communications Commission ("FCC" or "Commission") hereby requests that the FCC grant it special temporary authority ("STA"), for a period of thirty (30) days, beginning on February 26, 2006, to operate the facilities associated with the satellite earth station (the "Station") referenced in the associated application for testing purposes only. PetroCom will ultimately operate the Station from the Atlantis oil production platform (the "Platform") in the Gulf of Mexico (the "Gulf") owned by BP Americas, Inc. ("BP"). The Station will allow PetroCom to provide service to BP, so that BP may communicate from the Platform to BP's headquarters in Houston, Texas. It is anticipated that the Station will be shipped to the Platform within thirty (30) days of grant of STA.<sup>1/</sup> PetroCom has separately obtained authority to operate the Station from the Platform on a permanent basis.<sup>2/</sup> This STA request is identical to one initially granted by the Commission to test the Station earlier last year ("June 2005 STA").<sup>3/</sup> Like the FCC's previous action approving temporary use of the Station, PetroCom believes that grant of STA is appropriate in this instance. Attached to the June 2005 STA application is evidence of frequency coordination for the shipyard and a radiation hazard study for the antenna.

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<sup>1/</sup> PetroCom is mindful that the FCC will likely only authorize temporary operations for a period of thirty (30) days. Accordingly, upon expiration of the STA requested here, PetroCom will request further STA until such time as the Station is transported to the Gulf. As noted below, because the facilities covered by the STA will not be permanently located at the site specified, it is more appropriate to seek continued STA that to obtain a permanent license for the station to operate at this location on a temporary basis.

<sup>2/</sup> See PetroCom License Corporation, FCC File No. SES-LIC-20050505-00538, Call sign E050131 (granted June 13, 2005).

<sup>3/</sup> See PetroCom License Corporation, FCC File No. SES-STA-20050623-00809, Call sign E050131 (granted June 27, 2005) ("June 2005 STA"). PetroCom requested and obtain further STA to test these facilities when it became apparent that the station would not be transported to the Gulf during the time frame initially envisioned. See PetroCom License Corporation, FCC File No. SES-STA-20050722-00929, Call sign E050131 (granted July 27, 2005); PetroCom License Corporation, FCC File No. SES-STA-20050823-01129, Call sign E050131 (granted August 26, 2005); PetroCom License Corporation, FCC File No. SES-STA-20050920-01301, Call sign E050131 (granted September 22, 2005); PetroCom License Corporation, FCC File No. SES-STA-20051021-01454, Call sign E050131 (granted October 26, 2005); PetroCom License Corporation, FCC File No. SES-STA-20051118-01604, Call sign E050131 (granted November 29, 2005); PetroCom License Corporation, FCC File No. SES-STA-20051219-01772, Call sign E050131 (granted December 29, 2005). As the Commission is aware, PetroCom's operations have been dramatically affected by the devastation caused by Hurricanes Katrina and Rita. While PetroCom reasonably expected that the equipment that is the subject of this STA request would have been deployed in the Gulf, and on the Atlantis oil production platform months ago, the effects of Hurricanes Katrina and Rita have severely disrupted scheduling of activities in the Gulf. Accordingly, PetroCom's need for further STA was completely unforeseen.



As PetroCom explained in its request for the June 2005 STA, prior to shipping the Station to the Platform and deploying the Station on the Platform, it is necessary for PetroCom to test the Station at the KOS shipyard in Engleside, Texas. By testing the Station before it is deployed in the Gulf, PetroCom will be able to ensure its proper functioning prior to shipment. Once the Station is shipped to the Platform it will be the principal source of communications from the Platform. Because the Station will be the primary means of communications on the Platform, testing after the installation of the Station poses a risk to the safety and health of personnel onboard as well as to the environment, in the event of an incident requiring intervention. With testing verified at the shipyard in Engleside, communications will be available immediately once the Station are installed. The need for adequate testing before installation on the Platform has become even more important in the wake of Hurricanes Katrina and Rita

Accordingly, testing of the Station at the shipyard location is necessary before the Station is transported to the Platforms in the Gulf. STA under these conditions is contemplated by Section 25.120(a) of the FCC's rules, which states that STA may be requested for "circumstances requiring...temporary use of facilities."<sup>4/</sup> It would be inefficient for the FCC to process an application for permanent authorization for the Station at the shipyard facility, because of the limited duration at which the Station will be located there.

Accordingly, the FCC is requested to issue STA to PetroCom, effective February 26, 2006, for a period of thirty (30) days, so that it may test the Station on land before it is deployed to the Platform in the Gulf. If there are any questions regarding this STA request, the FCC is asked to contact communications counsel for PetroCom, Russell H. Fox of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., 202-434-7483, [rfox@mintz.com](mailto:rfox@mintz.com).

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<sup>4/</sup> 47 C.F.R. § 25.120(a).

**Attachment 2**  
**PetroCom License Corporation**  
**Application for Earth Station Special Temporary Authority**

**Request for Waiver**

PetroCom License Corporation ("PetroCom") hereby requests that the Federal Communications Commission ("FCC" or "Commission") waive the provisions of Section 25.209 of the rules to permit it to operate an earth station antenna in the 4/6 GHz Band (the "C Band") that does not comply with the antenna gain limitations specified in the FCC's rules. This waiver request is submitted in support of PetroCom's request for special temporary authority ("STA") to operate a satellite earth station (the "Station") for testing at a temporary location. PetroCom has already been granted permanent authority, including waiver of the rules covering the non-compliant earth station antenna, for the Station to operate on an oil platform in the Gulf of Mexico. PetroCom has also been granted temporary authority on several instances to test the antenna in June 2005 ("June 2005 STA").<sup>1/</sup> Technical materials supporting the already granted waiver request were submitted with the application for permanent authority ("Permanent Application") and are incorporated herein by reference.

Petrocom attests to the fact that, as demonstrated by the attached Radiation Hazard Report included in the June 2005 STA request, the safe limits for non-ionizing radiation (1m/W/cm<sup>2</sup>) will not be exceeded.

Despite the fact that the main beam of the proposed earth station antenna does not conform to the provisions of Section 25.209(a) and (b), the FCC should grant the requested waiver and STA because PetroCom will not cause unacceptable levels of interference under conditions of uniform two degree orbital spacings. The antenna pattern of the Station exceeds the gain specifications of Section 25.209 for the sidelobe envelope in the  $\pm 1.0^\circ$  to  $1.9^\circ$  region by a maximum of 9.0 dB, at 6 GHz. Outside the main beam, the antenna meets the requirements of Section 25.209 of the FCC's rules.

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<sup>1/</sup> See PetroCom License Corporation, FCC File No. SES-LIC-20050505-00538, Call sign E050131 (granted June 13, 2005) ("Permanent Application"). PetroCom incorporates by reference the application for the Atlantis earth station and the related exhibits documenting the technical parameters that support a waiver request. The Commission previously granted STA for testing of this Station. See PetroCom License Corporation, FCC File No. SES-STA-20050623-00809, Call sign E050131 (granted June 27, 2005) ("June 2005 STA"); see also PetroCom License Corporation, FCC File No. SES-STA-20050722-00929, Call sign E050131 (granted July 27, 2005); PetroCom License Corporation, FCC File No. SES-STA-20050823-01129, Call sign E050131 (granted August 26, 2005); PetroCom License Corporation, FCC File No. SES-STA-20050920-01301, Call sign E050131 (granted September 22, 2005); PetroCom License Corporation, FCC File No. SES-STA-20051021-01454, Call sign E050131 (granted October 26, 2005) PetroCom License Corporation, FCC File No. SES-STA-20051118-01604, Call sign E050131 (granted November 29, 2005); PetroCom License Corporation, FCC File No. SES-STA-20051219-01772, Call sign E050131 (granted December 29, 2005). The frequency coordination and radiation hazard study are attached to the June 2005 STA request as Exhibits A and B.

However, the effects of non-compliance with the antenna gain requirements are ameliorated by the reduction in power of the transmit antenna. The provisions of Section 25.212 of the FCC's rules specify that the maximum RF power density normally licensed for smaller diameter antennas, utilizing C-band data traffic, is -2.7 dBW/4 kHz. The Station is proposed to operate with an RF transmit power density of -18.5 dBW/4 kHz. A comparison of the FCC's maximum authorized RF transmit power density (-2.7 dBW/4 kHz) and the actual transmit power density of the proposed earth station (-18.5 dBW/4 kHz), indicates that the applied-for transmit power density is 15.8 dBW lower than the specified power restrictions. When the antenna pattern envelopes are considered, the applied-for transmit power density is still 6.8 dBW less than the maximum RF power density normally licensed by the FCC.

To support PetroCom's claim that the operation it proposes will not cause adjacent satellites exposure to greater EIRP density from PetroCom's facilities than those adjacent satellites would experience from an antenna conforming to the gain patterns of Section 25.209(a) and operating at the EIRP density limits specified in Section 25.212(c), Petrocom submitted an Electrical Test Report prepared for the antenna manufacturer showing the gain patterns of the antenna. To supplement this claim Petrocom also submitted a data table showing how the proposed operation meets the Commission's off-axis criteria at various elevation angles.

Finally, this reduced RF transmit power will result in acceptable performance for the antenna with respect to adjacent satellite interference. PetroCom will operate with the AMC-3 satellite (87° W.L.). PetroCom has obtained consent to the use of these non-conforming antennas from all affected parties. Affidavits from PanAmSat and Loral attesting that they are aware and acknowledge PetroCom proposed operation in the C Band and that they do not object to that operation are attached to the Permanent Application. In any case, if the use of this antenna should cause interference into other systems, PetroCom will terminate transmissions immediately upon notice from the affected parties.

The antenna is not compliant at two degrees for receive operations. PetroCom does not believe, however, that this non-compliance will unduly affect its receive signal quality. Moreover, PetroCom will accept any adjacent satellite interference in the receive band.

Finally, PetroCom notes that previous licenses and STA requests have been granted to it by the FCC for this size antenna. Accordingly, grant of the requested STA will be consistent with past Commission practice.

Should there be any questions regarding this waiver request, the FCC is asked to contact communications counsel for PetroCom, Russell H. Fox of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., 202-434-7483, [rfox@mintz.com](mailto:rfox@mintz.com).