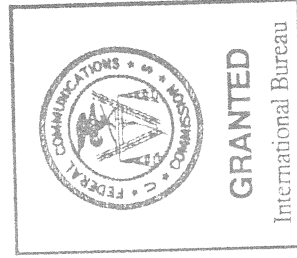


APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:  
Blanket MET STA Request 3/2006

**I. Applicant**

**Name:** BT Americas Inc. **Phone Number:** 703-755-6733  
**DBA Name:** **Fax Number:** 703-755-6740  
**Street:** 11440 Commerce Park Drive **E-Mail:** linda.cicco@bt.com  
**City:** Reston **State:** VA  
**Country:** USA **Zipcode:** 20191  
**Attention:** Ms. Linda J. Cicco



File # SFS - STA - 20060315 - 00445  
with attached conditions  
Call Sign E06D076 Grant Date 5/12/2006  
(or other identifier) Term Dates  
From 5/12/2006 To: 7/11/2006  
Approved: [Signature]  
Robert G. Nelson Chief Satellite Division

**BT Americas, Inc.**  
**IBFS File No. SES-STA-20060315-00445**

The request of BT Americas, Inc. (BT Americas) for special temporary authority (STA) IS GRANTED. Accordingly, BT Americas is authorized for a period of 60 days, ending July 11, 2006, to operate up to 5,000 Broadband Global Area Network (BGAN) mobile earth terminals (METs) using the Inmarsat 4F2, in accordance with the terms, conditions, and technical specifications set forth in the Commission's rules and this document.

1. Neither the aggregate uplink EIRP densities in the direction of any other L-band satellite serving the United States, nor the downlink EIRP densities at any geographical point within the United States, shall be increased, above the levels previously authorized in connection with operations using the Inmarsat 3F4 satellite, as a result of the operations authorized by this STA.
2. Operations on the Inmarsat 4F2 satellite shall be on an unprotected basis. BT Americas shall not claim protection from, and is required to accept interference from, other lawfully operating satellites or radiocommunication systems.
3. Operations are permitted on those frequencies previously used for authorized U.S. MET operations on the Inmarsat 3F4 satellite, except that operations are not permitted on certain frequencies, made available to Inmarsat by MSV USA and MSV Canada as part of the operator-to-operator coordination process, the use of which is currently an issue pending in connection with BT Americas' request for regular authority.
4. Adequate guard bands shall be provided between the band edges of the carriers used by BT Americas and the band edges of MSV's operations in order to preclude the possibility of unacceptable interference to MSV's operations.
5. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at BT Americas' own risk.
6. The grant of this STA is not based on a finding that Inmarsat's L-band operations are consistent with operation on a non-interference basis.
7. The grant of this STA is without prejudice to any future determination that the Commission may make as to whether Inmarsat's L-band operations are consistent with operation on a non-interference basis.
8. This STA may be terminated or modified at the International Bureau's discretion, without a hearing, if conditions warrant.
9. BT Americas must notify each customer, in writing and prior to initiation of service, that BGAN operations on the Inmarsat 4F2 satellite are pursuant to a grant of special temporary authority that may be terminated or modified at any time.
10. Authority granted in this STA is without prejudice to the disposition of any related applications for regular authority.
11. BT Americas shall not provide facilities-based or resale common carrier service that meets the definition, or is the functional equivalent, of a commercial mobile radio service, without receiving authorization under Section 214 of the Communications Act. For purposes of this condition, the definition of a commercial mobile radio service is set forth in Section 332(d) of the Communications Act and Section 20.3 of the Commission's rules.

**BT Americas, Inc.**  
**IBFS File No. SES-STA-20060315-00445**

12. This grant is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately.
13. BT Americas is afforded thirty days from the date of release of this action to decline this special temporary authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the special temporary authorization as conditioned.

<b>2. Contact</b>	
<b>Name:</b> Linda J. Cicco	<b>Phone Number:</b> 703-755-6733
<b>Company:</b> BT Americas Inc.	<b>Fax Number:</b> 703-755-6740
<b>Street:</b> 11440 Commerce Park Drive	<b>E-Mail:</b> linda.cicco@bt.com
<b>City:</b> Reston	<b>State:</b> VA
<b>Country:</b> USA	<b>Zipcode:</b> 20191 -
<b>Attention:</b>	<b>Relationship:</b> Same
(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?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).	
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee	
<input type="radio"/> Other (please explain):	
4b. Fee Classification CGB – Mobile Satellite Earth Stations	
5. Type Request	
<input checked="" type="radio"/> Use Prior to Grant	<input type="radio"/> Change Station Location <input type="radio"/> Other
6. Requested Use Prior Date	
04/17/2006	
7. City	
8. Latitude	
(dd mm ss.s h) 0 0 0.0	

9. State

10. Longitude  
(dd mm ss.s h) 0 0 0.0

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.)

See Attachment 1.

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 &quot;party to the application&quot;; for these purposes.

Yes  No

14. Name of Person Signing  
Linda J. Cicco

15. Title of Person Signing  
Regulatory Compliance 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).

## STA REQUEST

BT Americas, Inc. (“BT Americas”) seeks special temporary authority (“STA”) pursuant to Section 25.120 of the Commission’s rules, 47 C.F.R. § 25.120, for 60 days to allow BT Americas to provide Inmarsat’s Broadband Global Area Network (“BGAN”) service using up to 5,000 mobile earth terminals (“METs”) operating in the L-band in conjunction with the Inmarsat 4F2 satellite located at the 52.75° W.L. orbital location. Temporary authority to provide the BGAN service using these METs and this satellite will allow BT Americas to offer Inmarsat’s BGAN service in the United States while the International Bureau (“Bureau”) considers the underlying BGAN application previously filed by BT Americas.

### I. BACKGROUND

On March 3, 2006, BT Americas filed an application (“BT Americas BGAN Application”) for a blanket license to operate 20,000 METs with Inmarsat’s BGAN service (File Nos. SES-LFS-20060303-00343, SES-AMD-20060315-\_\_\_\_<sup>1</sup>). BT Americas hereby incorporates by reference that application and its technical details and material for purposes of this STA request.<sup>2</sup>

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<sup>1</sup> BT Americas attempted to file an amendment on March 15, 2006 to provide additional technical information requested by the staff, but experienced technical difficulties with IBFS. We will update the record with the appropriate amendment file number once the technical difficulties are resolved and the amendment is entered into the system.

<sup>2</sup> BT Americas also incorporates by reference all ownership information and certifications provided in the original BT Americas BGAN Application.

In the BT Americas BGAN Application, BT Americas proposes to offer Inmarsat BGAN services to U.S. consumers through four different BGAN METs: NERA PUT manufactured by NERA, AddValue PUT manufactured by AddValue, T&T Lite manufactured by Thrane and Thrane, and HNS Briefcase manufactured by Hughes Network Systems. Each offers a different combination of size and data transmission capability, and all comply with the Commission's Rules for operation in the L-band.<sup>3</sup> BT Americas plans to operate its METs with Inmarsat's fourth generation satellite, the Inmarsat 4F2, which is located at 52.75° W.L.

BT Americas expects to be able to provide the BGAN service over the Inmarsat 4F2 by April 17, 2006, but understands the Bureau will not be able to complete its review of the BT Americas application by that date. Accordingly, BT Americas respectfully requests an STA to provide the BGAN service in the United States as soon as it becomes available.

For the same reasons set forth in the BT Americas BGAN Application, grant of this STA is consistent with the ORBIT Act<sup>4</sup> and satisfies the Commission's *DISCO II* standard.<sup>5</sup>

## II. PUBLIC INTEREST

Grant of this STA request is in the public interest because it will

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<sup>3</sup> File No. SES-LFS-20060303-00343, Exhibit B.

<sup>4</sup> 47 U.S.C. § 761 *et seq.*

<sup>5</sup> See *Amendment of the Commission's Policies to Allow Non-U.S. Licensed Space Stations providing Domestic and International Service in the United State*, 12 FCC Rcd 24094 (1997) ("*DISCO II*").

allow U.S. consumers, including the U.S. military and public safety community in particular, to access faster, more flexible, and more robust satellite broadband services. These satellite broadband services will likely prove invaluable when the next natural disaster or terrorist attack occurs.

The BT Americas BGAN service will offer U.S. consumers Internet Protocol packet-switched data and circuit-switched applications at speeds up to 492 Kbps. BGAN will provide U.S. customers broadband access to e-mail, local area networks, the Internet, intranet/extranets, video conferencing services, video-on-demand, and voice communications from almost anywhere in the world.<sup>6</sup> BGAN operates at eight times the speed of the fastest mobile services available in the U.S. (Inmarsat GAN), and 100 times faster than MSV's services. BGAN service is currently available in Europe, Africa, Asia and the Middle East.<sup>7</sup> Prompt Commission grant of this request would allow U.S. subscribers to enjoy the same advanced mobile satellite services as the rest of the world, instead of operating at a fraction of the speed.

BGAN is needed as soon as possible by the U.S. military and the public safety community, which is seeking improved data speeds in the event of a large-scale natural disaster or terrorist attack. The recent natural disasters associated with hurricanes Katrina, Rita and Wilma in the Gulf of Mexico region

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<sup>6</sup> File No. SES LFS-20060303-00343, Exhibit B at 10.

<sup>7</sup> Inmarsat Announces Launch of BGAN Service, Inmarsat website, *available at* <http://about.inmarsat.com/news/00018831.aspx?language=EN&testonly=False>.



demonstrate an urgent need for the BGAN offering and approval of this STA request. While the existing Inmarsat services played a vital role in the recovery efforts, the data transmission speeds of these existing services relied on in the Gulf, and throughout the United States, do not match the high speed terrestrial networks people have come to expect. Prompt grant of this STA will ensure that the higher data speeds offered by BGAN will be available when the next natural disaster or terrorist attack takes place. Indeed, hurricane season begins this year on June 1<sup>st</sup>.<sup>8</sup> Accordingly, grant of this STA by April 17<sup>th</sup> will allow government “First Responders” and private industry users time to obtain and deploy BGAN terminals and familiarize themselves with those terminals, as well as the BGAN services and features, so that BGAN can have immediate impact on any advance preparations or recovery effort that becomes necessary. Such extraordinary circumstances justify grant of this requested STA.

BGAN service is already available in Europe, Africa, Asia and the Middle East. The benefit of equality of service is clear. U.S. customers will be able to subscribe to BT Americas BGAN service in the United States and use it around the world. Similarly, individuals that already use BGAN in other parts of the world will be able to operate their equipment in the United States.

The Inmarsat 4F2 satellite located at 52.75° W.L., which will be used to provide the BGAN service, can be operated in a manner that will cause

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<sup>8</sup> See <http://www.noaanews.noaa.gov/stories2005/s2540.htm>.

no greater potential for interference than Inmarsat's former satellite located at 54° W.L., Inmarsat 3. In many ways, Inmarsat 4F2 is more "interference friendly" than Inmarsat 3 because Inmarsat 4F2 has narrower spot beams with steeper antenna side lobes to reduce interference into adjacent areas, and it has higher gain spot beams to allow the use of terminals that radiate less than one-tenth the power of the Inmarsat data terminals currently used in the United States. In sum, BGAN service will be provided on Inmarsat 4F2 in a manner that will not adversely affect the current interference environment.

BT Americas understands that grant of this requested STA will be without prejudice to and will be conditioned on, the Bureau's action on the underlying application (File Nos. SES-LFS-20060303-00343, SES-AMD-20060315-\_\_\_\_<sup>9</sup>) for a blanket license to operate its 20,000 METs with Inmarsat's BGAN service.

For the reasons set forth above, BT Americas respectfully requests that this STA be granted no later than April 17, 2006 for 60 days.

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<sup>9</sup> See n.1, *supra*.

## CERTIFICATE OF SERVICE

I, Cecelia Burnett, hereby certify that on this 15<sup>th</sup> day of March, 2006, I served a true copy of the foregoing Request for Special Temporary Authority by electronic mail upon the following:

Roderick Porter  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Gardner Foster  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Robert Nelson  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Andrea Kelly  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Cassandra Thomas  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Scott Kotler  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Howard Griboff  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Karl Kensinger  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Fern Jarmulnek  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

John Martin  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Stephen Duall  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Jennifer A. Manner  
Vice President, Regulatory Affairs  
Mobile Satellite Ventures Subsidiary,  
L.L.C.  
1002 Park Ridge Boulevard  
Reston, Virginia 20191

James Ball  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

John P. Janka  
Jeffrey A. Marks  
Latham & Watkins, L.L.P.  
555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 20004

Bruce D. Jacobs  
David S. Konczal  
Pillsbury Winthrop Shaw Pittman, L.L.P.  
2300 N Street, N.W.  
Washington, D.C. 20037-1128

Diane J. Cornell  
Vice President, Government Affairs  
Inmarsat, Inc.  
1100 Wilson Blvd., Suite 1425  
Arlington, Virginia 22209

/s/ Cecelia M. Burnett  
Cecelia M. Burnett