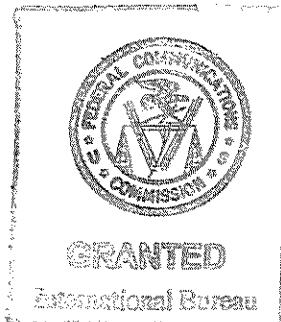


APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
STA to test earth station prior to deployment in Gulf of Mexico

I. Applicant

Name:	PetroCom License Corporation	Phone Number:	504-736-9400
DBA Name:		Fax Number:	504-734-6100
Street:	5901 Earhart Expressway	E-Mail:	kwright@petrocom.com
City:	Harahan	State:	LA
Country:	USA	Zipcode:	70123 -
Attention:	Mr Kenneth Wright		



File # SES-STA-20071120-01605
Call Sign E070119 Grant Date 11/26/09
(or other identifier)
From 11/23/07 Term Dates To 12/22/09
Appx. d: Jeanette W. Spriggs

2. Contact			
Name:	Russell Fox	Phone Number:	202.434.7483
Company:	Mintz, Levi, Cohn, Ferris, Glovsky and Popeo, P.C.	Fax Number:	202.434.7400
Street:	701 Pennsylvania Ave., NW Suite 900	E-Mail:	rfox@mintz.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20004 -
Attention:	Russell Fox	Relationship:	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 SESLIC2007062200852 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 CGX – Fixed Satellite Transmit/Receive Earth Station			
5. Type Request			
<input type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other			
6. Requested Use Prior Date			
11/23/2007			

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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 November 23, 2007, to operate the facilities associated with the satellite earth station (the “Station”) described in the attached technical description, for testing purposes only. PetroCom will ultimately operate the Station from the Tahiti oil production platform (the “Platform”) in the Gulf of Mexico (the “Gulf”) owned by Chevron. The Station will allow PetroCom to provide service to Chevron. The Station will permit Chevron to communicate from the Platform to Chevron personnel on shore. It is anticipated that the Station will be shipped to the Platform within sixty (60) days of grant of STA. PetroCom has received authority to operate the Station on a permanent basis from the Platform.^{1/} The FCC previously issued STA to PetroCom covering the interim operation of this station for testing purposes, but testing is not yet complete and the Station is not yet ready to be shipped to the Platform.^{2/}

As the FCC has recognized by granting PetroCom STA for testing purposes under similar conditions, 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 a shipyard in Ingleside, Texas.^{3/} 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 Ingleside, communications will be available immediately once the Station is installed.

Accordingly, testing of the Station at the shipyard location is necessary before the Station is transported to the Platform in the Gulf. STA under these conditions is contemplated by Section

^{1/} See PetroCom License Corporation, FCC File No. SES-LIC-20070622-00852, Callsign E070119 (granted July 31, 2007).

^{2/} See PetroCom License Corporation, FCC File No. SES-STA-20071022-01447 (granted October 23, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070921-01307 (granted September 25, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070823-01118 (granted August 27, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070724-00981 (granted July 26, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070626-00871 (granted June 27, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070524-00719 (granted May 25, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070424-00513 (granted April 27, 2007).

^{3/} See, e.g., *Id.*; PetroCom License Corporation, FCC File No. SES-STA-20050623-00809, Callsign E050131 (granted June 27, 2005); PetroCom License Corporation, FCC File No. SES-STA-20041123-01729, Callsign E040444 (granted December 7, 2004).

25.120(a) of the FCC's rules, which states that STA may be requested for "circumstances requiring...temporary use of facilities." 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 November 23, 2007, 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@mlintz.com.

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 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 test a satellite earth station (the “Station”) at a location other than where it will be permanently installed. PetroCom has obtained permanent authorization for the Station, which included a separate request for waiver of the rules in connection with that application.^{1/} Attached to this waiver request are the following exhibits:

- Exhibit A - Frequency Coordination for Testing
- Exhibit B - Radiation Hazard Study
- Exhibit C - Schedule B, Technical and Operational Description of Earth Station During Testing
- Exhibit D - Electrical Test Report for SeaTel 2.4 m Antenna
- Exhibit E - Data Tables
- Exhibit F - Affidavits from Adjacent Satellite Operators

PetroCom attests to the fact that, as demonstrated by the attached Radiation Hazard Report (Exhibit B), the safe limits for non-ionizing radiation (1m/W/cm²) 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 2 degree orbital spacings. The antenna pattern of the Station exceeds the gain specifications of Section 25.209 for the sidelobe envelope in the ±1.0° to 1.9° 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.

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 -34.96 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 (-34.96 dBW/4 kHz), indicates that the applied-for transmit power density is 32.76 dBW lower than the specified power restrictions. When the

^{1/} See PetroCom License Corporation, FCC File No. SES-LIC-20070622-00852, Callsign E070119 (granted July 31, 2007).

antenna pattern envelopes are considered, the applied-for transmit power density is still 23.76 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 submits an Electrical Test Report prepared for the antenna manufacturer showing the gain patterns of the antenna. To supplement this claim Petrocom is also submitting a data table showing how the proposed operation meets the Commission's off-axis criteria at various elevation angles.

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 degrees 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's proposed operation in the C Band and that they do not object to that operation are attached hereto. 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.

Finally, PetroCom notes that previous licenses and STAs have been granted to it by the FCC for this size antenna, including for this Station.²⁷ Accordingly, grant of the requested STA and the forthcoming underlying application 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.

²⁷ See, e.g., PetroCom License Corporation, FCC File No. SES-STA-20071022-01447 (granted October 23, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070921-01307 (granted September 25, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070823-01118 (granted August 27, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070724-00981 (granted July 26, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070626-00871 (granted June 27, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070524-00719 (granted May 25, 2007); PetroCom License Corporation, FCC File No. SES-STA-20070424-00513 (granted April 27, 2007); PetroCom License Corporation, FCC File No. SES-STA-20050623-00809, Callsign E050131 (granted June 27, 2005); PetroCom License Corporation, FCC File No. SES-STA-20041123-01729, Callsign E040444 (granted December 7, 2004); PetroCom License Corporation, FCC File No. SES-LIC-20050505-00538, Callsign E050131 (granted June 13, 2005); PetroCom License Corporation, FCC File No. SES-STA-20041122-01722, Callsign E040444 (granted January 26, 2005).