

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:
ASDR/ASDR-O STA request (Domingus Hills)

1. Applicant

| | | | |
|-------------------|---------------------------------|----------------------|------------------------------------|
| Name: | COMTECH MOBILE DATACOM CORP. | Phone Number: | 240-686-3300 |
| DBA Name: | | Fax Number: | 240-686-3301 |
| Street: | 20430 Century Boulevard | E-Mail: | david.ulanow@comtechmobile. com |
| City: | Germantown | State: | MD |
| Country: | USA | Zipcode: | 20874 - |
| Attention: | Mr David A Ulanow | | |



File # SES-STA-20090410-00439
Call Sign E090029; Grant Date 4/28/09
(or other identifier)
From 5/1/09 Term Dates To: 6/29/09
Approved: Jeanette D. Spriggs

Comtech Mobile Datacom Corp.
IBFS File No. SES-STA-20090410-00439
Call Sign E090029

The request of Comtech Mobile Datacom Corp. (Comtech) for special temporary authority (STA) IBFS File No. SES-STA-20090410-00439 IS GRANTED. Accordingly, Comtech is authorized for a period of 60 days, beginning May 1, 2009, to operate up to 100 full-duplex data mobile earth terminals (METs) (Call Sign E090029) using any ISAT satellite in the 1525-1544 MHz, 1545-1559 MHz, 1626.5-1645.5 MHz, and 1646.5-1660.5 MHz frequency bands. Operations shall be in accordance with the terms, conditions, and technical specifications set forth in the Commission's rules, this document, and its STA request File No. SES-STA-20090410-00439.

1. All operations shall be on an unprotected and non-harmful interference basis, *i.e.*, Comtech shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station.
2. In the event of any harmful interference as a result of Comtech's operations, Comtech shall cease operations immediately upon notification of such interference, and shall inform the Federal Communications Commission (FCC), in writing, immediately of such an event.
3. Comtech's operation of its 100 METs is on a secondary basis to safety and distress communications of those stations operating in the Aeronautical Mobile [R] Service and the Global Maritime Distress Satellite Service.
4. Comtech's operations must comply with the out-of-band emission limits for mobile earth terminals set forth in 47 C.F.R. § 25.216.
5. Comtech may only operate on frequencies not shared with aeronautical or maritime distress services.
6. Grant of this STA is without prejudice to any action that the Commission may make regarding Comtech's pending application to operate the above-referenced MESSs (as well as certain other MESSs) (IBFS File No. SES-LIC-20090211-00171).
7. This action 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. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.
8. This authorization is not one relating to an "activity of a continuing nature" for purposes of Section 1.62 of the Commission's rules and Section 558(c) of the Administrative Procedure Act. Continuation of operations beyond the 60 day term of this authorization will require prior affirmative authorization by the FCC.

2. Contact

| | | | |
|-------------------|-------------------------------|----------------------|-------------------------|
| Name: | Joan M. Griffin | Phone Number: | 202-342-8573 |
| Company: | Kelley Drye & Warren LLP | Fax Number: | 202-342-8451 |
| Street: | 3050 K Street NW Suite 400 | E-Mail: | jgriffin@kelleydrye.com |
| City: | Washington | State: | DC |
| Country: | USA | Zipcode: | 20007 - |
| Attention: | | 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 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 CGB – Mobile Satellite Earth Stations

5. Type Request

- Use Prior to Grant Change Station Location Other

6. Requested Use Prior Date
05/01/2009

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: STA request Attachment 2: Exhibit A Attachment 3: Exhibits B, C, and D | |
| 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;"> Comtech requests an STA to operate up to 100 full duplex L-band METs throughout the US on ISAT for a 60-day period starting 5/1/09 </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 Greg Handermann | 15. Title of Person Signing EVP & CTO |
| 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). | |

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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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.

Description of STA Request

Comtech Mobile Datacom Corporation (“CMDC”) requests special temporary authority (“STA”), pursuant to Section 25.120(b)(2) of the Commission’s Rules, to operate up to 100 full-duplex data mobile earth terminals (“METs”) in portions of the L-band (1525-1544/1545-1559 MHz and 1626.5-1645.5/1646.5-1660.5 MHz) in CONUS, Alaska, Hawaii, and any U.S. territory or possession within the footprint of an ISAT satellite. The METs CMDC proposes to operate pursuant to the requested authority are CMDC’s ASDR and ASDR-O METs. Proposed particulars of operation for these METs are as described in CMDC’s blanket MET license application in File No. SES-LIC-20090211-00171 (the “CONUS Application,” E0900029) under Site ID “ISAT-ASDR.” The CONUS Application encompasses the authority sought in this STA request.

In support of this STA request, CMDC provides the following information:

- Exhibit A: excerpts from FCC Form 312, Schedule B to the CONUS Application.
- Exhibit B: Radiation Hazard Study.
- Exhibit C: Section 25.137 information.
- Exhibit D: letter from INMARSAT regarding CMDC’s use of dedicated channels.

CMDC asks that the Commission grant this authority beginning May 1, 2009 for a minimum of 60 days and preferably until such time as the Commission acts on the CONUS Application. CMDC notes that the public notice period for the CONUS Application will end on or about April 17, 2009¹ and thus that the CONUS Application will be ripe for grant before May 1. Should the Commission grant the CONUS Application on or before May 1, CMDC will withdraw this STA request.

Section 25.120(b)(1) of the Commission’s Rules provides that the Commission may grant a temporary authorization only upon a finding that there are extraordinary circumstances requiring temporary operations in the public interest and that delay in the institution of these temporary operations would seriously prejudice the public interest. CMDC submits that such extraordinary circumstances exist here. CMDC is requesting an STA to satisfy the needs of one of its current customers, the U.S. Army, for a demonstration of CMDC’s ASDR and ASDR-O METs. Grant of this STA request will serve the public interest in that it will allow the Army to evaluate these terminals and associated services, which are more spectrally efficient and thus more cost effective than existing terminals and services.

At the same time, CMDC’s operations pursuant to the authority requested herein will not, in all likelihood, result in any harm to the public interest. CMDC notes that since the proposed terminals are full-duplex, CMDC’s operation pursuant to this STA request will fully comply with the requirements of Section 25.136(d) of the FCC Rules and NTIA’s requirements regarding the

¹ See Report No. SES-01121, rel. Mar. 18, 2009.

protection of maritime and aeronautical mobile-satellite service distress and safety communications.

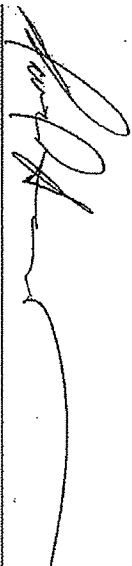
CMDC acknowledges that any grant of this STA request is without prejudice to, and will be conditioned on, the Commission's final action on any CMDC application. CMDC's operations will comply with any applicable conditions for the operation of METs with satellites on the ISAT list.

For the reasons set forth above, CMDC respectfully requests that this STA be granted no later than May 1, 2009, if the CONUS Application cannot be granted on or before that date.

VERIFICATION

I, David A. Ulanow, am Director of Contracts of Comtech Mobile Datacom Corporation ("CMDC"). I am authorized to represent CMDC and to make this verification on its behalf. The statements in the foregoing document relating to CMDC are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.



Subscribed and sworn to before me this eight day of April, 2009.



JULIA A. HOWARD
NOTARY PUBLIC
MONTGOMERY COUNTY
MARYLAND

My Commission expires: _____
My Commission Expires July 11, 2011