



December 10, 2009

System Analysis Branch Satellite Division International Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Request for Special Temporary Authority

Pursuant to Section 25.120(a) of the Rules and Regulations ("Regulations") of the Federal Communications Commission ("Commission"), Petrocom License Corporation. ("Petrocom") seeks Commission consideration for a Special Temporary Authority ("STA") to operate a new earth station.

According to Section 25.120(b)(3) of the Regulations, the Commission may grant temporary authority for a period not to exceed 60 days, if the STA request has not been placed on public notice, and the applicant plans to file a request for regular authority for the service. In the instant case, the STA request has not been placed on public notice and Petrocom plans to file an application for regular authority. Therefore, Petrocom respectfully requests an STA for a period not to exceed 60 days.

According to Section 25.120 (b)(1) of the Regulations, "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."

In the instant case, Petrocom operates a GSM cellular network in the Gulf of Mexico. Various cell towers are backhauled from Gulf of Mexico fixed platforms to inland interconnection points through satellite links. Because of damage caused by Hurricanes Ike, some of this cellular infrastructure was damaged requiring upgrade or replacement. The current application plans to use the <u>AMC-3 (87W)</u> satellite.

Petrocom's GSM cellular network is the only licensed cellular service in the Gulf of Mexico and is used extensively by crew members of the various oil exploration and production platforms. Some cell sites are being switched from Ku to C-band to improve reliability while others are being deployed as new sites.

In order to insure restoration of this damaged site and uninterrupted service, the requested date for prior use is <u>December 15, 2009</u>. In accordance to Section 25.120(a) of the Regulations, this STA is being filed at least 3 working days prior to the date of proposed operation.

Because of the nature of operations in this platform and the critical role of the existing earth station communications link, it is in the public interest that the proposed earth station be operational to accommodate the critical calls that are placed by platform personnel. In addition, should there be an emergency in this platform; this earth station would be used to place calls to communicate with the appropriate agencies.

Sincerely,

/s/ Raul Magallanes
Attorney