

## **EXHIBIT A – REASON FOR SPECIAL TEMPORARY AUTHORITY**

NewCom International, Inc. (“NewCom”), pursuant to Section 25.120(b)(3) of the Commission’s Rules, 47 C.F.R. § 25.120(b)(3), hereby requests special temporary authority (“STA”) for a period of 60 days to operate a 4.5 meter Ku-band antenna using the Amazonas-2 geostationary satellite at 61° west longitude (“Amazonas-2”) during the pendency of NewCom’s permanent modification application to add the aforementioned satellite as a point of communication to Call Sign E050018.<sup>1</sup> Grant of this STA request will allow NewCom to better support lifeline communications, including telemedicine and basic telephony services to remote end users in rural Latin America, most of which have no alternative means of establishing cost effective communications.

NewCom operates a world class teleport facility in Miami, Florida, that for six (6) years has provided communications to customers in underserved areas of the world.<sup>2</sup> Most recently, NewCom has undertaken the extraordinary task of extending duplex connectivity to over 1,000 remote satellite terminal sites in rural Colombia that have no other reliable transmission medium for domestic or international communications.<sup>3</sup> For these customers, NewCom’s service is literally a lifeline to the rest of the world. Among other core applications, NewCom’s services in Colombia and elsewhere support hospitals, humanitarian relief efforts and educational institutions.

This STA is needed because NewCom can no longer reliably provide lifeline communications to Latin America and other remote parts of the Western Hemisphere using the existing commercial fixed satellites visible from Miami, and must immediately implement a redundant route using Amazonas-2’s extended Ku-band transponder payload to ensure that mission critical applications have adequate bandwidth. In particular, the medical professionals and humanitarian agencies that have come to heavily rely on NewCom’s service are urgently in need of additional throughput to accommodate advanced telemedicine and logistical planning applications. The ability to uplink in the extended Ku-band will free several underutilized transponders on the Amazonas-2 capable of accommodating the applications of NewCom’s medical and humanitarian end users. Although the Amazonas-2 is already on the FCC’s Foreign Satellite Permitted List,<sup>4</sup> this authority does not encompass the transponder pairings that transmit space-to-earth in the conventional Ku-band between 11.7 and 12.2 GHz, but receive earth-to-space transmissions in the extended Ku-band between 13.75 and 14.0 GHz.

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<sup>1</sup> See FCC File No. SES-MFS-20100430-00497 (“*NewCom Amazonas-2 Application*”).

<sup>2</sup> See, e.g., FCC File No. SES-STA-20050112-00038 *et al.*, describing NewCom’s extensive efforts to provide communications to hospitals and educational facilities in locations unserved by terrestrial infrastructure.

<sup>3</sup> See NewCom Awarded Expanded Role in Colombia Communications Project, The Link, Dec. 15, 2009, available at: <http://www.newcom-intl.com/index.php/news/the-link-newsletter/59-newcom-awarded-expanded-role-in-colombia-communications-project.html> (last visited May 3, 2010).

<sup>4</sup> See FCC File No. SAT-PPL-20090806-00081.

By way of reference, NewCom hereby incorporates the information and exhibits provided in modification application SES-MFS-20100430-00497. The proposed operations pursuant to grant of this STA request will comport with the parameters set forth in the aforementioned application, including maximum EIRP per carrier, maximum EIRP density and maximum EIRP density towards the horizon. An interference analysis demonstrates that NewCom's proposed operations will not affect U.S. Navy and National Aeronautics and Space Administration facilities.<sup>5</sup>

NewCom cannot accommodate the services it proposes to provide on the Amazonas-2 using alternative satellites. NewCom has explored purchasing transponder capacity from other regional and international satellite operators with comparable coverage of the western hemisphere. Despite a comprehensive search, NewCom has been unable to identify sufficient transponder capacity to satisfy its lifeline customers' urgent needs. Moreover, NewCom's end users are not served by reliable terrestrial facilities of any kind.

Grant of this STA serves the public interest by mitigating the detrimental effect of the ongoing capacity shortage in the fixed satellite industry on NewCom's lifeline customers with mission critical applications that cannot tolerate downtime or degradation of the transmission service. Specifically, it will allow end users to operate telemedicine and other applications that can no longer be properly supported by NewCom's existing facilities and existing fixed satellite systems. Grant is requested on or before May 31, 2010.

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<sup>5</sup> See *NewCom Amazonas-2 Application, Exhibit B*.