

STA Justification

Pursuant to Federal Communications Commission (“FCC” or “Commission”) Rule Section 1.931(a), Valley Communications of Moses Lake, Inc. dBa Telewaves (“Valley” or the “Company”) hereby requests Special Temporary Authority (“STA”) to operate a Fixed Satellite Earth Station in the Ku Band (“Station”) as indicated on the attached application.

The Station was originally licensed on call sign E000054 (the “License”), which was inadvertently allowed to expire on March 31, 2010. The company experienced a change in general managers and the records relating to its FCC authorizations were not properly maintained. Upon discovering the error, Valley evaluated its system and determined that the Station is still needed to maintain reliability of its operations. Accordingly, Valley filed a new application, Application Submission ID: IB2010001610 (the “Application”) to relicense these facilities and is requesting the instant STA.

The Company operates a regional one-way paging system, and is considered a very small business under the FCC’s auction standards. As cellular systems have become increasingly ubiquitous and able to meet a variety of communications requirements, facilities such as those operated by Valley have faced diminished revenue. Their remaining customers are those with the very specialized need for cost-efficient critical messaging and group business communications, such as emergency service and medical personnel in local hospitals or fire departments, where mobile phones typically cannot reach users or where mobile phone service is problematic or prohibited. Most of these customers also have cellular phones, which they use for personal messages, but their business requirements are better and more cost-effectively served with a one-way paging system.

Grant of the instant request is in the public interest as it will ensure reliable paging service to the various businesses Valley serves in the state of Washington. Thus, the STA will directly benefit public safety by maintaining the vital communications necessary for emergency medical services and other critical operations.

In the event that the FCC has any specific questions or is in need of additional information, kindly contact Katherine Patsas Nevitt or Elizabeth Sachs with Lukas, Nace, Gutierrez & Sachs at (703) 584-8676 / kpatsas@fcclaw.com or (703) 584-8663 / lsachs@fcclaw.com respectively.