

Attachment 1
Blue Marble Network LLC
Application for Earth Station Special Temporary Authority

JUSTIFICATION FOR SPECIAL TEMPORARY AUTHORITY

Blue Marble Network LLC (“Blue Marble”), pursuant to Section 25.120(b)(3) of the Commission’s rules hereby requests that the Commission grant it special temporary authority (“STA”) for a period of sixty (60) days beginning on October 20, 2010. Through the STA, Blue Marble seeks to test its proposed earth stations onboard vessels network (“ESV Network”), which is described in its pending license application.¹ The STA operations will be for beta testing purposes only.

Blue Marble proposes to undertake its initial testing dockside in Seattle, Washington after the ESV Network’s equipment is properly loaded and installed on the vessel during the week of October 20, 2010. Blue Marble’s proposed testing would shift to beta testing once the vessel leaves port, which it is scheduled for the following week. The vessel is expected to be at sea for a period of 30-45 days. Beta testing during this period will allow Blue Marble to gain experience in passing traffic through its ESV Network under operational conditions.

While operating under STA, Blue Marble will operate within the parameters described in its pending application, as amended, and will not claim protection from any other operator. The only distinctions from the proposed operations under the permanent application are (1) Blue Marble will not transmit in the 14.0-14.2 GHz band within 125 km of the NASA TDRSS facilities on Guam or in the 14.47-14.5 GHz band within 125 km of the radio observatory on Mauna Kea, Hawaii unless and until coordination through the National Telecommunications and Information Administration’s Interdepartment Radio Advisory Committee is complete; and (2) Blue Marble will not operate in the 12.2-12.75 GHz band, which it has requested a waiver to operate in through the permanent application.

Grant of the STA will serve the public interest. The STA will enable a testing program that will allow Blue Marble to roll out its ESV Network in the most efficient manner. Through the development of its ESV network, Blue Marble will be able to serve a customer base that will include transoceanic merchants shipping cargo using both U.S. and foreign-flagged vessels. The voice and data services that Blue Marble will provide will serve the public interest by enabling its customers to supplement their existing communications systems to improve their internal operations and give their crew members an effective means for communicating offshore.

¹ Blue Marble Network, LLC, Application for Authority, Call Sign E100102, File No. SES-LIC-20100917-01170 (accepted for filing Sept. 29, 2010), as amended Blue Marble Network, LLC, Amended Application for Authority, Call Sign E100102, Temporary File No. SES-AMD-INTR-2010-03230 (filed Oct. 18, 2010). The application, as amended, is incorporated herein by reference.

Accordingly, Blue Marble requests that the FCC issue STA to Blue Marble, effective October 20, 2010, for a period of sixty (60) days, so that it may test the proposed ESV Network before it is commercially deployed.