

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Telesat Network Services, Inc. (“Telesat”), pursuant to Section 25.120 of the Commission’s rules is hereby seeking Special Temporary Authority (“STA”) to operate two Ku-band earth stations on vessels (“ESV”) antenna types mostly consistent with the manner described in its currently pending application for modification to add the SeaTel 2406 and the SeaTel 6006 to its existing authorization for gateway and ESV operations (Call Sign KA399) on a permanent basis. Telesat hereby respectfully requests STA for up to thirty (30) days, beginning as soon as possible, for the reasons explained below.

As background, Telesat filed an application on April 30, 2010 seeking to modify its license for station KA399 by adding 250 units of each of the above-referenced antenna types to its already active ESV network.¹ Subsequent to the submission of its modification application, it became apparent to Telesat that, in addition to the standard Ku-band receive frequency of 11700-12200 MHz, its customers would require downlink authority for the new SeaTel units in the 10950-11200 MHz, 11450-11700 MHz, and 12500-12750 MHz bands in the areas covered by the Africa and Europe beams of the Telstar 11N satellite, which is the point of communication for ESV operations in those regions.

Telesat filed an amendment to its modification application to include those frequency bands on November 3, 2010.² At the time that Telesat filed its amendment, FCC staff notified Telesat that authorization for the 12500-12750 MHz frequency band would require coordination with IRAC, which process can take an extended period of time.

Accordingly, Telesat is hereby seeking relief by way of STA to initiate operations of its ESV units during the completion of that coordination as well as of the final processing of its modification application. However, in recognition that authority for use of the 12500-12750 MHz band even on a temporary basis might also require coordination with IRAC, Telesat is hereby removing receive operations into that band from the instant request. Telesat believes that by doing so, the Commission’s staff can act more quickly on its request for temporary authority to operate the units otherwise consistent with its pending application for permanent authority.

The instant request for Special Temporary Authority is supported by good cause. Telesat’s customers utilize the ESV units to communicate back to Telesat’s hub in Mt. Jackson, Virginia. A number of the vessels that rely upon this ESV authority have already upgraded their units from predecessor models to the enhanced 2406 and 6006

¹ See SES-MOD-20100513-00590; Public Notice as accepted for filing on Jul. 21, 2010 (Report No. SES-01262).

² See SES-AMD-20101103-01392; Public Notice as accepted for filing on Nov. 10, 2010 (Report No. SES-01293).

devices in order to take advantage of greater physical stability and thus improved robustness of communications. Grant of the instant request will permit those vessels to begin communication on these enhanced devices while Telesat's application undergoes final review.

Additionally, Telesat's proposed ESV operations are, as shown in the modification application, nearly identical to those for which it currently has authority. Grant of the instant STA request, therefore, will not pose a risk of harmful interference to other users of radio spectrum. In any event, Telesat's operations pursuant to an STA would be on a non-harmful interference basis.

Accordingly, for the foregoing reasons, Telesat hereby respectfully requests grant of the instant request for Special Temporary Authority to begin operation of additional ESV units in the manner described herein as soon as is possible. Telesat requests that any questions with regard to this matter be directed to its telecommunications counsel, Joseph A. Godles, at 202-429-4900.