REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Introduction

Pursuant to Section 25.120 of the Commission's rules, Telesat Network Services, Inc. ("Telesat") hereby requests Special Temporary Authority ("STA") to operate its 15-m antenna, which is licensed under Call Sign KA399 and is located at Telesat's teleport in Mt. Jackson, Virginia, to perform the test described below. STA is needed because during the test Telesat will be using a different point of communication, frequency band, and carrier than is specified in the license for the 15-m antenna.

Telesat has an urgent need to conduct the test so it can determine whether the 15-m antenna can be used as a temporary replacement for a 9-m antenna that also is licensed to operate at the Mt. Jackson teleport and that has demonstrated signs of failure. Accordingly, Telesat requests that its STA request be granted as soon as possible. Although the test is expected to last only 4-6 hours, out of an abundance of caution Telesat asks that its STA cover the seven-day period beginning with grant of the STA.

Discussion

Telesat's failing 9-m antenna serves as a hub for earth stations on vessels (ESV) services. It transmits in the 13.81-14 GHz band using Telesat's Telstar 11N satellite as a point of communication.

Before Telesat's 15-m antenna can be operated as a temporary replacement for the 9-m antenna, the company needs to reconfigure the antenna for operation in the 13.81-14 GHz band and to test the antenna in that band to confirm that the reconfiguration has been successful. To that end, Telesat seeks an STA to operate its 15-m antenna using an unmodulated CW carrier in the 13810-13995 MHz band, with corresponding receive frequencies at 11510-11695 MHz (see attached Schedule B). The point of communication for this transmission is Telesat's Telstar 14 satellite located at 109.2° W.L. ¹

There are no potential conflicts between the proposed test and other services. Additionally, Telstar 14 is stationed over 57 degrees from the nearest TDRSS satellites, which are located at 41° W.L. and 167° W.L., and is significantly

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¹ The Commission previously granted authority for a company affiliated with Telesat to use Telstar 14, also known as Estrela do Sul 1, to provide service in the United States. *See In the Matter of Loral Skynet do Brasil, Petition for Declaratory Ruling to Add Estrela do Sul 1, a Ku-band Satellite, to the Permitted Space Station List,* Order, DA 03-4095 (rel. Dec. 23, 2003; FCC File Nos. SAT-PDR-20021010-00196 and SAT-WAV-20031202-00352). Accordingly, the technical characteristics of the satellite have been reviewed and approved by the Commission. At the time, the satellite was operated at 63° W.L. and was licensed by Brazil. At its present location of 109.2° W.L., the satellite is licensed by Canada, which is a WTO member. To the extent that Section 25.137 of the rules and competitive considerations are relevant to a limited-time request for an STA, therefore, there is a presumption that grant of Telesat's STA request will enhance competition and therefore is in the public interest. *See In re Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, Report and Order, 12 FCC Rcd. 24094, 24112 (1997).

more distant from the nearest TDRSS satellite than is the Telstar 11N satellite with which Telesat's ESV hub already communicates.

Telesat's STA request is supported by good cause. Telesat's 9-m antenna is in critical need of maintenance, and it is anticipated that this maintenance will take 30 to 60 days. Grant of Telesat's STA request will facilitate this maintenance and help ensure that Telesat can maintain continuity of service while maintenance is ongoing. Numerous maritime vessels rely on this service for an array of communications needs. Telesat also is preparing, and will file in the near future, a request for an STA to operate its 15-m antenna as a temporary replacement for its 9-m antenna.

Telesat has confirmed that there are no other adjacent satellites within six degrees of T14 at 109.2° W.L. except for ANIK F1, which is owned and operated by a Telesat affiliate. Accordingly, an internal coordination has been conducted to ensure that no interference will occur to the operations on ANIK F1 owing to the proposed test.

Accordingly, and for good cause shown, Telesat respectfully requests that its STA request be granted.

FCC 312 Schedule B	FEDERA SATELLII (Teel	AL COMMUNICA FE EARTH STAT hnical and Oners	FEDERAL COMMUNICATIONS COMMISSION SATELLITE EARTH STATION AUTHORIZATIONS (Technical and Operational Description)	Page 1: Location
License of New Station	Registration of New Domestic Am	(Place an "X" in one of the blocks below) Amendment to a Pending Application	of the blocks below) Application Modification o	Modification of License/Registration Notification of Minor Modification
B1. Location of Earth Station Site.	ite. If temporary-fixed, mobile, or For VSAT networks attach ind Location, Points of Communic	VSAT remote facility invidual Schedule B, I cations, and Destinations.	y, specify area of operation s Page 1 sheets for each hub st on Points for each hub and re	If temporary-fixed, mobile, or VSAT remote facility, specify area of operation and point of contact. If VSAT hub station, give its location. For VSAT networks attach individual Schedule B, Page 1 sheets for each hub station and each remote station. Individually provide the Location, Points of Communications, and Destination Points for each hub and remote station.
Bla. Station Call Sign B1b. S KA 399	Blb. Site Identifier (HUB, REMOTE1, etc.)		B1c. Telephone Number 540-477-5550	B1j. Geographic Coordinates NS, B1k Lat/Lon Deg - Min Sec E/W Coordinates are:
BId. Street Address of Station or Area of Operation	peration	Ble. Name of Contact Person	Person	Lat. 38 43 46 N NAD-27
1305 Industrial Park Road		Matt Spears		Lon. 78 39 30 W \times NAD-83
BI£ City Mount Jackson	Big County Shenandoah	I	B1h. State B1i. Zip Code VA 22842	e B11. Site Elevation (AMSL) 295.9 meters
B2. Points of Communications:	List the names and orbit locations identify the names and locations o	of all satellites with vof all satellite facilities	which this earth station will or sicensed by the U.S. All no	B2. Points of Communications: List the names and orbit locations of all satellites with which this earth station will communicate. The entry "ALSAT" is sufficient to identify the names and locations of all satellite facilities licensed by the U.S. All non-U.S. licensed satellites must be listed individually.
Satellite Name and Orbit Location		Satellite Name and Orbit Location	Location	Satellite Name and Orbit Location
Telstar 14, 109.2°	201			
B3. Destination points for comm	nunications using non-U.S. licensed destination point satellite system.	sed satellites. For each non-U.S. licount(s) (countries) where the service in. Use additional sheets as needed	ch non-U.S. licensed satellite lere the services will be provi leets as needed.	B3. Destination points for communications using non-U.S. licensed satellites. For each non-U.S. licensed satellite facility identified in section B2 above, specify the destination point(s) (countries) where the services will be provided by this earth station via each non-U.S. licensed satellite system. Use additional sheets as needed.
Satellite Name	List of Destination Points			
				TOC 212 School Brown 1

Page 2: Antennas

FEDERAL COMMUNICATIONS COMMISSION SATELLITE EARTH STATION AUTHORIZATIONS

FCC Form 312 - Schedule B: (Technical and Operational Description)

B4. Earth Station Antenna Facilities: Use additional pages as needed.

									1200		
(g) Anterna Gain Transmit and/or Receive	62.9 dBi @ 12000	64.5 dBi @ 14000									
(f) Antenna Size (meters)	7.	2		*							
(e) Model	15KDK	N INC									
(d) Manufacturer	Varia	٨٥١١٥٨									4.2
(c) Quantity	1	_									
(b) Anterna ID**	15M	200								12	
(a) Site ID*											

B5. Antenna Heights and Maximum Power Limits: (The corresponding Antenna ID in tables B4 and B5 applies to the same antenna)

A) Tetal ETBB	for all carriers (dBW)	93.10				
(g) Total Input	Power at antenna flange (Watts)	1445				
(f) Maximum	Anterna Height Above Rooftop (meters)***			1		
(e) Building	Height Above Ground Level (meters)***					
Maximum Antenna Height	(d) Above Mean Sea Level (meters)	295.85			,	
Maximum Ar	(c) Above Ground Level (meters)	13				
Maximum Anterna Height (e) Building (f) Maximum (g) Total Input	(b) Anterna Structure Registration No.					
((a) Anterna ID**	15M				

Notes: * If this is an application for a VSAT network, identify the site (Item B1b, Schedule B, Page 1) where each antenna is located. Also include this Site-ID on Schedule B, Page 5.

** Identify each antenna in VSAT network or multi-antenna station with a unique identifier, such as HUB, REMOTE1, A1, A2, 10M, 12M, 7M, etc. Use this same antenna ID throughout tables B4, B5, B6, and B7 when referring to the same antenna.

*** Attach sketch of site or exemption, See 47 CFR Part 17.

FOC 312, Schedule B - Page 2 February, 1998

SATELLITE EARTH STATION AUTHORIZATIONS FEDERAL COMMUNICATIONS COMMISSION

FCC Form 312 - Schedule B: (Technical and Operational Description)

B6. Frequency Coordination Limits: Use additional pages as needed.

Do. Frequency	0 11 11 11 11 11 11 11 11 11 11 11 11 11	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			;	/ \ 1_4 O	ALY Example Charleson	(i) Maximum FIRP
(a) Antenna ID*	(b) Frequency Limits (MHz)	(c) Range of Satellite Arc Eastern Limit**	(d) Range of Satellite Arc Western Limit**	(e) Antenna Elevation Angle Eastern Limit	(I) Amema Elevation Angle Western Limit	Azimuth Angle Eastern Limit	Azimuth Angle Western Limit	Density toward the Horizon (dBW/4kHz)
15M				35.1	35.1	223.6	223.6	-23.2
15M	11,510 - 11,695	109.2 W	109.2 W	35.1	35.1	223.6	223.6	
			-					
			•					

Notes: * Provide the ANTENNA-ID from table B4 to identify the antenna to which each frequency band and orbital arc range is associated.

*** If operating with geostationary satellites, give the orbital arc limits and the associated elevation and azimuth angles. If operating with non-geostationary satellites, give the notation "NON-GEO" for the satellite arc and give the minimum operational elevation angle and the maximum azimuth angle range.

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Page 4: Particulars

B7. Particulars of Operation (Full particulars are required for each r.f. carrier): Use additional pages as needed.

					-		
	-						
					-		
				,			
			100HNON	ΛΉ	73	11,510 - 11,695	
CW unmodulated	46.4	85.00	100HNON	N/H	⊣	13,810 - 13,995	15M
(h) Description	(g) Maximum EIRP Density per Carrier (dBW/4kHz)	(f) Maximum EIRP per Carrier (dBW)	(e) Emission Designator	(d) Antenna Polarization (H,V,L,R)	(c) T/R Mode	(b) Frequency Bands (MHz)	(a) Antenna ID*
						,	

Notes: * Provide the ANTENNA-ID from table B4 to identify the antenna to which each frequency band and emission is associated. For VSAT networks, include frequencies and emissions for all HUB and REMOTE units.

*** Indicate whether the earth station transmits or receives in each frequency band.

Page 5: Questions

SATELLITE EARTH STATION AUTHORIZATIONS FEDERAL COMMUNICATIONS COMMISSION

NON X ON NO X ON X ONX B10e. Zip Code FAILURE TO COMPLY WITH 47 CFR PARTS 17 AND 25 WILL RESULT IN THE RETURN OF THIS APPLICATION. YES YES YES YES YES x YES B8. If the proposed antenna(s) operate in the Fixed Satellite Service (FSS) with geostationary satellites, do(es) the proposed antenna(s) B10d. State / Country FCC Form 312 - Schedule B: (Technical and Operational Description) comply with the antenna gain patterns specified in Section 25.209(a) and (b) as demonstrated by the manufacturer's qualification B10g Call Sign of Control Station (if appropriate) B9. If the proposed antenna(s) do not operate in the Fixed Satellite Service (FSS), or if they operate in the Fixed Satellite Service (FSS) with non-geostationary satellites, do(es) the proposed antenna(s) comply with the antenna gain patterns specified in measurements? If NO, provide as an exhibit, a technical analysis showing compliance with two-degree spacing policy. If VSAT Network, provide the SITE-ID (Item B1b) of the station that B8-B13 are in response to (HUB, REMOTE1, etc.): B10. Is the facility operated by remote control? If YES, provide the location and telephone number of the control point. B13. FAA Notification - (See 47 CFR Part 17 and 47 CFR Part 25.113(c))
Where FAA notification is required, have you attached a copy of a completed FCC Form 854 B11. Is frequency coordination required? If YES, attach a frequency coordination report as an exhibit. Section 25.209(a2) and (b) as demonstrated by the manufacturer's qualification measurements? B12. Is coordination with another country required? If YES, attach the name of the country(ies) and/or the FAA's study regarding the potential hazard of the structure to aviation? B10c. County and plot of coordination contours as an exhibit. Remote Control Point Location: B10£ Telephone Number B10a Street Address B10b. City