

## 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.<sup>1</sup>

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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<sup>1</sup> 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.











FEDERAL COMMUNICATIONS COMMISSION  
 SATELLITE EARTH STATION AUTHORIZATIONS  
 FCC Form 312 - Schedule B: (Technical and Operational Description)

If VSAT Network, provide the SITE-ID (Item B1b) of the station that B8-B13 are in response to (HUB, REMOTE1, etc.): \_\_\_\_\_

B8. If the proposed antenna(s) operate in the Fixed Satellite Service (FSS) with <b>geostationary</b> satellites, do(es) the proposed antenna(s) comply with the antenna gain patterns specified in Section 25.209(a) and (b) as demonstrated by the manufacturer's qualification measurements? If NO, provide as an exhibit, a technical analysis showing compliance with two-degree spacing policy.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
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 <b>non-geostationary</b> satellites, do(es) the proposed antenna(s) comply with the antenna gain patterns specified in Section 25.209(a2) and (b) as demonstrated by the manufacturer's qualification measurements?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
B10. Is the facility operated by remote control? If YES, provide the location and telephone number of the control point.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
<b>Remote Control Point Location:</b>		
B10a. Street Address	_____	
B10b. City	B10c. Country	B10d. State / Country B10e. Zip Code
B10f. Telephone Number	B10g. Call Sign of Control Station (if appropriate)	
B11. Is frequency coordination required? If YES, attach a frequency coordination report as an exhibit.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
B12. Is coordination with another country required? If YES, attach the name of the country(ies) and plot of coordination contours as an exhibit.	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
<b>B13. FAA Notification - (See 47 CFR Part 17 and 47 CFR Part 25.113(c))</b> Where FAA notification is required, have you attached a copy of a completed FCC Form 854 and/or the FAA's study regarding the potential hazard of the structure to aviation? <b>FAILURE TO COMPLY WITH 47 CFR PARTS 17 AND 25 WILL RESULT IN THE RETURN OF THIS APPLICATION.</b>		