

## 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"), beginning as soon as possible, to operate its earth station hub and associated Earth Stations on Vessels ("ESVs"), all licensed under Call Sign KA399, in the manner described herein. Telesat has pending an application to modify its license for KA399,<sup>1</sup> and it seeks authority in this STA request to implement on an interim basis two of the changes proposed in the modification application. In particular, Telesat requests an STA to add Estrela do Sul 2 at 63° W.L. as a point of communication on standard Ku-band frequencies and to operate an additional ESV model, SeaTel SE-125. Telesat is not seeking an STA to implement the other changes proposed in the modification application for KA399.

It has become apparent that processing of Telesat's modification application will take longer than usual. Although Telesat submitted the application on March 8, 2012, the application has not been accepted for filing and has not appeared on Public Notice. An STA will enable Telesat to commence service by employing the more routine elements proposed in the modification application while processing of the application continues. Telesat's STA request, therefore, is supported by good cause.

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<sup>1</sup> File No. SES-MOD-20120308-00248.

## Discussion

### *Adding Estrela do Sul 2 as a Point of Communication*

Telesat's hub antennas and ESVs already are licensed to communicate via Telstar 11N. Telesat seeks authority in this STA request to add Estrela do Sul 2<sup>2</sup> as a point of communication for transmissions on standard Ku-band frequencies.

The Commission added Estrela do Sul 2 to the Permitted Space Station List on April 4, 2011.<sup>3</sup> In general, therefore, the satellite may be used as a point of communication by routinely-licensed U.S. earth stations. However, because Telesat's earth station authorization currently does not include ALSAT or Estrela do Sul 2 as points of communication (the former of which it is seeking to restore and the latter which it is adding by its subject modification application), it requires an STA to access Estrela do Sul 2 while its modification application is pending.

### *Adding SeaTel SE-125 ESVs*

The license for KA399 authorizes the operation of multiple ESV models. In this STA request, Telesat seeks to add one more model, SeaTel SE-125, to the authorized list.

As documented in Telesat's modification application, the Commission has authorized another licensee to operate SeaTel SE-125 ESVs. As also shown in the modification application, Telesat's proposed operating parameters for SeaTel SE-

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<sup>2</sup> The license for Estrela do Sul 2, which was issued by Brazil, is held by Telesat's affiliate, Telesat Brasil Capacidade de Satelites Ltda.

<sup>3</sup> See File No. SAT-PPL-20110112-00012.

125 are nearly identical to those the Commission previously authorized. Grant of Telesat's request to operate SeaTel SE-125 on an STA basis, therefore, will pose no risk of harmful interference. In any event, Telesat's operations pursuant to an STA would be on a non-harmful interference basis.

A number of seagoing vessels that rely on Telesat's KA399 authority, moreover, have been upgraded to accommodate SeaTel SE-125 ESVs in anticipation of being able to enjoy the benefits of that model's superior physical stability and improved robustness. Grant of the instant request will permit those vessels to implement use of the SeaTel SE-125 while the Commission completes its review of Telesat's modification application.

*National Radio Quiet Zone*

Mt. Jackson is in a National Radio Quiet Zone. Accordingly, and in accordance with the requirements of Section 1.924 of the Commission's rules, Telesat previously notified the National Radio Astronomy Observatory (NRAO) of the technical details of the operations proposed herein.

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