

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**  
**(CALL SIGN KA399)**

**Introduction**

Pursuant to Section 25.120 of the Commission's rules, Telesat Network Services, Inc. ("Telesat") hereby requests Special Temporary Authority ("STA"), beginning on or before July 3, 2012, to operate its earth station hub and associated Earth Stations on Vessels ("ESVs"), all licensed under Call Sign KA399, in the manner described herein for a period of 30 days. Telesat has pending an application to modify its license for KA399,<sup>1</sup> which modification it is concurrently amending herewith based on recent developments, and it seeks authority in this STA request to implement on an interim basis the changes proposed in the amendment to its modification application.

In particular, Telesat has imminent need for authority to: (1) operate its 15-m hub antenna with an expanded satellite arc that has 106.5 ° W.L. as the Western Limit; (2) add MSAT-1 and MSAT-2 as points of communication; (3) operate the 15-m hub antenna on two additional frequencies, which are in the standard Ku-band band; and (4) operate two additional ESV models, Intellian V60G and V110. Telesat is not seeking authority in this filing to implement any other changes proposed in the modification application for KA399. For reasons stated below, Telesat's STA request is support by good cause.

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

## Discussion

*Expanding the Arc of 15-m Hub to 106.5 ° W.L.in the Western Limit/Adding MSAT-1 and MSAT-2 as Points of Communication/Adding Two Standard Ku-band Frequencies*

Telesat's U.S. teleport operations group was recently informed that it would be assuming back-up TT&C duty for LightSquared's MSAT-1 and MSAT-2 satellites, at 103.3° W.L. and 106.5° W.L., respectively. The satellites are currently controlled from a Canadian-licensed facility, but the lease for that facility has been terminated with an effective date of July 9, 2012. In anticipation of the need to shift TT&C operations, LightSquared recently engaged Telesat to provide back-up TT&C to these satellites at Telesat's Mt. Jackson hub, which duty will commence by July 9.<sup>2</sup> Telesat is respectfully requesting STA on or before July 3, to provide it with just under a week to coordinate and implement the transition of the TT&C operations from the facility in Canada to Telesat's facility. Facilitating continuity of TT&C operations is unquestionably in the public interest.

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<sup>2</sup> In order to enhance control over MSAT-1 and MSAT-2, Telesat has been engaged to provide back-up TT&C service from two separate antennas, with one antenna primarily dedicated to each satellite. To ensure the fullest possible use of its resources, Telesat is seeking authority to add both satellites as a point of communication to each of the two antennas. Doing so will also permit Telesat to use either antenna for "ranging" operations, wherein it is able to track both or either satellite from either antenna. Telesat has prepared and is submitting concurrently herewith a second modification application and matching STA request seeking appropriate authority for the second antenna (Call Sign E060351).

Telesat's earth station authorization currently lacks authority for MSAT-1,<sup>3</sup> licensed by Canada, and MSAT-2, licensed by the United States, as points of communication. Accordingly, Telesat requests authority under its STA to add both satellites as points of communication.

Furthermore, Telesat's earth station is not authorized to see satellites as far as west as 106.5 W.L. or to operate on the two frequencies (14000.5 MHz and 14499.5 MHz) that are used by MSAT-1 and MSAT-2 for TT&C. Telesat is requesting authority for this expanded arc and for these additional frequencies in this modification application, and seeks authority herein to implement these changes on an interim basis.

*Adding Intellian V60G and V110 ESVs*

The license for KA399 authorizes the operation of multiple ESV models. In this STA request, Telesat seeks to add two more models – the Intellian V60G and V110 – to the authorized list. Telesat's amendment to its modification reflects the addition of the same units.

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<sup>3</sup> MSAT-1 is foreign satellite authorized by Industry Canada. Telesat does not contemplate herein to communicate with MSAT-1 except to provide TT&C services and to perform satellite ranging. Furthermore, the information normally required under 47 C.F.R. § 25.137 and in response to Question 42 of the Main Form of FCC Form 312 for foreign-licensed satellites has already been provided to and approved by the Commission in prior applications, and Telesat hereby incorporates that information by reference. *See, e.g., Applications of SatCOM Systems, Inc., et al.*, 14 FCC Rcd 20798 (1999); *see also In the Matter of Motient Services Inc. and TMI Communications and Company, LP, Assignors, and Mobile Satellite Ventures Subsidiary LLC, Assignee*, 16 FCC Rcd 20469 (2001); *In the Matter of Motient Corporation and Subsidiaries, Transferors, and SkyTerra Communications, Inc., Transferee*, 21 FCC Rcd 10198 (2006).

Both the V60G and V110 units are associated with a new Inmarsat service whose availability to ship operators is imminent. The service will be provided over Telesat's T11N satellite via its Mount Jackson hub. The new service will provide enhanced capabilities to a number of seagoing vessels that rely on Telesat's KA399 authority and, moreover, that have upgraded to accommodate antennas in anticipation of being able to enjoy the improved communications robustness of the new service. Grant of the instant request will permit those vessels to implement use of the new Inmarsat service while the Commission completes its review of Telesat's application.

As documented in Telesat's amendment to its modification application, the Commission has authorized other licensees to operate the newly identified ESV units. As also shown in the application materials, Telesat's proposed operating parameters for the antennas are nearly identical to those the Commission previously authorized. Grant of Telesat's request to operate the units on an STA basis, therefore, will pose no risk of harmful interference and in any event Telesat's operations pursuant to an STA would be on a non-harmful interference basis. Permitting operators at sea to benefit from a new and improved communications service is in the public interest.

## **Conclusion**

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