

## **Request for Special Temporary Authority**

SATCOM Digital Networks, LLC (“SATCOM”) requests special temporary authority (“STA”) for 60 days beginning August 10, 2012 to conduct on-site testing in the extended Ku-Band (13.75- 13.77 GHz and 13.78-14.00 GHZ) in preparation of operation using Amazonas-1 commencing September 1, 2012. The FCC may grant an STA for a period not to exceed 60 days where the STA request has not been placed on public notice and the applicant plans to file a request for regular authority for the service. An application for license for this operation has been filed with the Commission, (File Number SES-LIC-20120724-00688, filed July 24, 2012 and assigned call sign E120144).

SATCOM seeks use of AMAZONAS-1 in the extended Ku-Band to provide domestic service in the U.S. because it has the only available 36 MHz channel capacity. Details of the proposed operation are attached.

This system will provide U.S. domestic video services to institutional facilities, such as retirement housing and prisons. The requested STA serves the public interest by allowing SATCOM to perform necessary testing and to resolve any issues in preparation for operation. SATCOM’s service will meet niche market needs currently underserved or unserved in the marketplace.

**Exhibit For  
SATCOM Digital Networks  
Cranberry Township, Pennsylvania  
RSI Satcom 6.4 Meter Earth Station**

**Compliance with FCC Report & Order (FCC96-377) for the 13.75 - 14.0 GHz Band  
Analysis and Calculations**

**1. Background**

This Exhibit is presented to demonstrate the extent to which the proposed SATCOM Digital Network's satellite earth station, to be located in Cranberry Township, Pennsylvania, is in compliance with FCC REPORT & ORDER 96-377. The potential interference from the earth station to US Navy shipboard radiolocation operations (RADAR) and the NASA space research activities in the 13.75 - 14.0 GHz Band is addressed in this exhibit. The parameters for the earth station are:

**Table 1. Earth Station Characteristics**

- Coordinates (NAD83): 40° 42' 25.0" N, 80° 05' 44.0" W
- Satellite Location for Earth Station: Amazonas 1 and 2 at 61.0° WL
- Frequency Band: 13.75-14.0 GHz for uplink
- Polarizations: Circular and Linear
- Emissions: 23M0G7W
- Modulation: Digital
- Maximum Aggregate Uplink EIRP: 80.92 dBW for all Carriers
- Transmit Antenna Characteristics
  - Antenna Size: 6.4 meters in Diameter
  - Antenna Type/Model: RSI Satcom
  - Gain: 57.4 dBi
- RF power into Antenna Flange: 23.52 dBW or 9.9 dBW/ MHz  
or -14.1 dBW/4 kHz (Maximum)
- Minimum Elevation Angle:  
Cranberry Twp, Pa. 39.0° @ 152.0° Az. (Amazonas 1 & 2) at 61.0° W

- Side Lobe Antenna Gain:  $32 - 25 \cdot \log(\theta)$

Because the above uplink spectrum is shared with the Federal Government, coordination in this band requires resolution data pertaining to potential interference between the earth station and both Navy Department and NASA systems. Potential interference from the earth station could impact with the Navy and/or NASA systems in two areas. These areas are noted in FCC Report and Order 96-377 dated September 1996, and consist of (1) Radiolocation and radio navigation, (2) Data Relay Satellites.

Summary of Coordination Issues:

- 1) Potential Impact to Government Radiolocation (Shipboard Radar)
- 2) Potential Impact to NASA Data Relay Satellite Systems (TDRSS)

**2. Potential Impact to Government Radiolocation (Shipboard Radar)**

Radiolocation operations (RADAR) may occur anywhere in the 13.4 - 14 GHz frequency band aboard ocean going United States Navy ships. The Federal Communication Commission (FCC) order 96-377 allocates the top 250 MHz of this 600 MHz band to the Fixed Satellite Service (FSS) on a co-primary basis with the radiolocation operations and provides for an interference protection level of  $-167 \text{ dBW/m}^2/4 \text{ kHz}$ .

The closest distance to the shoreline from the Cranberry Township earth station is approximately 341 km Southeast toward the Chesapeake Bay. The calculation of the power spectral density at this distance is given by:

- |                             |                       |
|-----------------------------|-----------------------|
| 1. Clear Sky EIRP:          | 80.92 dBW             |
| 2. Carrier Bandwidth:       | 23.0 MHz              |
| 3. PD at antenna input:     | -14.1 dBW/4 kHz       |
| 4. Transmit Antenna Gain:   | 57.4 dBi              |
| 5. Antenna Gain Horizon:    | FCC Reference Pattern |
| 6. Antenna Elevation Angle: | 39.0°                 |

The proposed earth station will radiate interference toward the Chesapeake Bay according to its off-axis side-lobe performance. A conservative analysis, using FCC standard reference pattern, results in off-axis antenna gains of -9.9 dBi towards the Chesapeake Bay.

The signal density at the shoreline, through free space is:

$$\begin{aligned}
 \text{PFD} &= \text{Antenna Feed Power density (dBW/4 kHz)} + \text{Antenna Off-Axis Gain (dBi)} - \text{Spread Loss (dBw-m}^2\text{)}. \\
 &= -14.1 \text{ dBw/4 kHz} + (-9.9 \text{ dBi}) - 10 \cdot \log[4\pi \cdot (341000\text{m})^2] \\
 &= -145.6 \text{ dBW/m}^2/4 \text{ kHz} + \text{Additional Path Losses (}\sim\text{85.0 dB)} \\
 &= -230.6 \text{ dBW/m}^2/4 \text{ kHz}
 \end{aligned}$$

Our calculations indicate additional path loss of approximately 85.0 dB including absorption loss and earth diffraction loss for the actual path profiles from the proposed earth station to the nearest shoreline.

The calculated PFD including additional path losses to the closest shoreline location is  $-230.6$  dBW/m<sup>2</sup>/4 kHz. This is 63.6 dB below the  $-167$  dBW/m<sup>2</sup>/4 kHz interference criteria of R&O 96-377. Therefore, there should be no interference to the US Navy RADAR from the Cranberry Township earth station due to the distance and the terrain blockage between the site and the shore.

### **3. Potential Impact to NASA's Data Relay Satellite System (TDRSS)**

The geographic location of the SATCOM Digital Networks' earth station in Cranberry Township, Pennsylvania is outside the 390 km radius coordination contour surrounding NASA's White Sands, New Mexico ground station complex. Therefore, the TDRSS space-to-earth link will not be impacted by the SATCOM Digital Networks earth station in Cranberry Township.

The TDRSS space-to-space link in the 13.772 to 13.778 GHz band is assumed to be protected if an earth station produces an EIRP less than 71 dBW/6 MHz in this band. The 6.4 meter earth station antenna will have an EIRP greater than 71 dBW/6 MHz in this band. The total EIRP for all carriers is 80.92 dBW, and the equivalent EIRP per 6 MHz segment will be 77.09 dBW/6 MHz. Therefore, there could be interference to the TDRSS space-to-space link (Table 1).

In order to meet the 71 dBW/6 MHz interference criteria, the earth station would have to be limited to an RF power density 6.1 dB lower than the maximum of  $-14.1$  dBW/4kHz or  $-20.2$  dBW/4kHz for an EIRP of 74.82 dBW. If this operational condition cannot be met, then the Cranberry Township, Pennsylvania earth station may not be tuned to operate at the frequencies in the 13.770 to 13.780 GHz Band.

### **4. Coordination Issue Result Summary and Conclusions**

The results of the analysis and calculations performed in this exhibit indicate that compatible operation between the earth station at the Cranberry Township facility and the US Navy and NASA systems space-to-earth link are possible. This analysis has been based on the assumption of 23 MHz bandwidth carriers.

Operations in NASA systems space-to-space link (13770.0 to 13780.0 MHz) will not be permitted.

**Table 1**

**Excluded Frequency Range for SATCOM Digital Networks Earth Station**

<b>System</b>	<b>Frequency Restriction</b>
TDRSS	13.770-13.780 GHz (see Note 1)

**Note 1:** In order to meet the 71 dBW/6 MHz interference criteria, the earth station would have to be limited to a maximum total EIRP of 74.82 dBW.

No interference to US Navy RADAR operations from the Cranberry Township, Pennsylvania earth station will occur.