## REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY (CALL SIGN E060351)

## Introduction

Pursuant to Section 25.120 of the Commission's rules, Telesat Network Services, Inc. ("Telesat") hereby requests extension of its Special Temporary Authority ("STA"), originally issued under File No. SES-STA-20120620-00607, to operate its earth station hub, licensed under Call Sign E060351, in the manner described herein for a period of 60 days.

Telesat has pending an application to modify its license for E060351,<sup>1</sup> which modification it submitted based on recent developments. Telesat seeks authority in this extension request to continue to implement on an interim basis the changes proposed in its modification application.

In particular, Telesat has need for continued authority to: (1) add MSAT-1 and MSAT-2 as points of communication; and (2) operate the 4.6-m hub antenna on two additional frequencies, which are in the standard Ku-band band, using the 700KF9D transmit carrier and 138KGXD receive carrier. For reasons stated below, Telesat's STA request is support by good cause.

<sup>&</sup>lt;sup>1</sup> Submitted Jun. 20, 2012 (File No. SES-MFS-20120620-00559). Telesat also notes that it has since submitted an amendment to that application, in order to correct the coordinates that it recently identified as having been incorrectly entered in its application for initial earth station authority.

## Discussion

Adding MSAT-1 and MSAT-2 as Points of Communication/Adding Two Standard Ku-band Frequencies and TT&C Carriers

As it noted in its initial request for STA, Telesat's U.S. teleport operations group was 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, from July 9, 2012. Telesat has since been providing back-up TT&C to these satellites at its Mt. Jackson hub. Telesat respectfully requests extension of its STA to continue providing this service. Continuity of TT&C operations is unquestionably in the public interest.

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

Furthermore, Telesat's earth station is not currently authorized to operate on the two frequencies (14000.5 MHz and 14499.5 MHz) on the 700KF9D transmit carrier and 138KGXD receive carrier that are used by MSAT-1 and

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<sup>&</sup>lt;sup>2</sup> MSAT-1 is foreign satellite authorized by Industry Canada. As it indicated in its initial request for STA, 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 FCCRcd 10198 (2006).

MSAT-2 for TT&C. Telesat is herein requesting continued authority for these additional frequencies on those carriers that are one aspect of its pending modification application.

## Conclusion

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