

August 30, 2012

System Analysis Branch
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Request for Special Temporary Authority – Harris CapRock
Communications, Inc.

Pursuant to Section 25.120(b) of the Rules and Regulations (“Regulations”) of the Federal Communications Commission (“Commission”), Harris CapRock Communications Inc. (“HARRIS CAPROCK”) seeks Commission consideration to renew a Special Temporary Authority (“STA”) to operate Earth Stations on Vessels (“ESVs”) while an application for permanent authority is being reviewed. On May 9, 2012, HARRIS CAPROCK filed an application to modify its existing ESV license to include the Intellian V60 and V80¹ antennas (File No. SES-MOD-20120509-00427, callsign E060157). On July 3, 2012, HARRIS CAPROCK filed an STA application and was granted for a 30 day period as file SES-STA-20120703-00630. The existing STA expires on September 1, 2012.

According to Section 25.120(b)(1) of the Regulations, “*the Commission may grant a temporary authorization only upon a finding that there are extraordinary circumstances requiring temporary operations in the public interest and that delay in the institution of these temporary operations would seriously prejudice the public interest.*”

HARRIS CAPROCK is a global provider of fully managed communications solutions for remote and harsh environments. The proposed application would authorize HARRIS CAPROCK to operate ESVs on vessels that routinely perform new construction and maintenance of subsea facilities in the Gulf of Mexico. The communication links at issue will carry video images of subsea structures as well as their construction and maintenance. The proper supervision of subsea operations is paramount to the prevention of construction disasters as well as the safety of personnel engaged in such endeavors. This is an extraordinary circumstance that requires temporary operations in the public interest. The delay in the institution of these temporary operations would seriously prejudice the public interest.

¹ Intellian V60 is a Ku-band 60cm diam. stabilized antenna. The Intellian V80 is a Ku-band 80cm diam. Stabilized antenna. Both operate with a radome.

The analysis in the principal application has shown that the Intellian V60 and Intellian V80 antennas conform to the spectral density envelopes outlined in Section 25.222 of the Regulations when limited to -22.30 dB/4KHz and -20.13 dB/4KHz respectively, at the feed. Harris CapRock will operate within these limits. Furthermore, Intellian has certified that the antennas comply with the 100ms automatic shut-off for an off-axis deviation of more than 0.5 degrees from the target satellite.² The analysis in the application has also shown that radiation levels at the proposed terminals will be within the exposure limits of 47 CFR §1.1310

Pursuant to Section 25.120(b)(3) of the Regulations, the Commission may grant temporary authorization for a period not to exceed 60 days, if the STA has not been placed on public notice, and the applicant plans to file a request for regular authority for the service. In the instance case, the Commission has not placed the STA application on public notice. Furthermore, HARRIS CAPROCK has filed an application for permanent authority. HARRIS CAPROCK is asking the Commission to grant it STA beginning September 1, 2012. The planned satellites are G25 (93W) and Telstar 14 (63W).

Sincerely,

/s/ Raul Magallanes

Raul Magallanes
Counsel to Harris CapRock Communications, Inc.

² 47 C.F.R. §25.222(a)(1)(iii)(A).