

July 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 – Global Data Systems, Inc.

Pursuant to Section 25.120(b) of the Rules and Regulations (“Regulations”) of the Federal Communications Commission (“Commission”), Global Data Systems, Inc. (“GDS”) seeks Commission consideration for a Special Temporary Authority (“STA”) to operate Earth Stations on Vessels (“ESVs”) while an application for permanent authority is being reviewed. On July 30, 2012, GDS filed an application for a new ESV license to include the Seatel USAT30, 75cm, Ku-band antenna (“Antenna”) (File No. SES-LIC-20120730-00704, callsign E080193).

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.*”

GDS is a global provider of fully managed communications solutions for hard to reach environments. The proposed application would authorize GDS to operate ESVs on vessels that routinely perform energy related support operations in the Gulf of Mexico. The communication links support voice, data, and video for the ship operations as well as personal communications of the crew members. Given that the Gulf of Mexico is a remote area and, especially now, is subject to harsh conditions and the possibility of hurricanes, it is imperative that the ships can count on reliable communications systems. 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.

The analysis in the principal application has shown that the Antenna conform to the spectral density envelopes outlined in Section 25.222 of the Regulations when limited to -21.6 dB/4KHz, at the feed. GDS will operate within these limits. Furthermore, Seatel (Cobham) 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.¹ The analysis in

¹ 47 C.F.R. §25.222(a)(1)(iii)(A).

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, GDS has filed an application for permanent authority. GDS is asking the Commission to grant it STA for 60 day. The planned satellite is Intelsat 707 at 307 E.L

Sincerely,

/s/ Raul Magallanes

Raul Magallanes
Counsel to GDS Communications, Inc.