## Justification of Request for Special Temporary Authority

AMC Networks Broadcasting and Technology LLC ("AMC") hereby requests, pursuant to Section 15.120(b)(3), special temporary authority ("STA") for a period of sixty (60) days to operate a new antenna located at its existing facilities. Temporary use of the new antenna will allow it to provide higher-quality service to customers without risk of interruption that may affect approximately 4,000,000 end users.

AMC has been an innovator in television programming and entertainment for 31 years. It owns and operates several of the most popular and award-winning brands in cable television -- AMC, IFC, Sundance Channel, WE tv and IFC Films. In addition, it produces programming, using raw feeds from, among other sources, sporting events. It modifies these raw feeds by adding cues for commercial breaks and other control data used by the multichannel video programming distributors to whom it transmits the programming. AMC transmits the reformatted programming to MVPDs using its satellite transmit and receive earth stations and the MVPDs transmit the programming to their end user customers.

AMC uses the facilities associated with several satellite earth station licenses, including E010028 (the "License") to transmit programming. However, AMC transmits most of the reformatted programming described above using facilities associated with the station E000228. That station uses a 7.2 meter antenna. That antenna is not as useful as 9 meter C-Band antennas because the 9 meter C-Band antenna provides better focus and transmission characteristics. Therefore, AMC has submitted, simultaneously herewith, an application to modify the License to add a third 9 meter C-Band antenna manufactured by General Dynamics that will replace the 7.2 meter antenna authorized on the license for station E000228. It seeks STA to operate that additional antenna pursuant to the simultaneously application for modification.

As noted above, the antenna for which AMC seeks authorization will be used to transmit some of the programming now carried by its currently authorized facilities. AMC is concerned that these existing 7.2 meter facilities, in addition to being less capable than the proposed 9 meter antenna, may be reaching the end of their useful lives and AMC wishes to be able to operate the new antenna for which it seeks authority prior to FCC action on the application for modification. If the FCC does not grant STA and the existing facilities become non-operational, AMC may be unable to transmit programming to its MVPD customers, an occurrence that may affect approximately 4,000,000 of its customers' viewers. The public interest will therefore be served by grant of the STA. The application for modification has been submitted with evidence of frequency coordination and other relevant engineering demonstrations, ensuring that there will be no harmful interference from the proposed new antenna. No party will, therefore, potentially be negatively affected by grant of the STA.

If there are questions concern this STA request, the Commission is asked to contact counsel for AMC, Russell H. Fox of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PC at 202.434.7483 or <u>RFox@mintz.com</u>