

May 17, 2013

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

Re: Request for Special Temporary Authority, Shell Communications, Inc.

Pursuant to Section 25.120(b) of the Rules and Regulations (“Regulations”) of the Federal Communications Commission (“Commission”), Shell Communications, Inc. (“Shell”) seeks Special Temporary Authority (“STA”) to test a fixed C-band antenna at a shipyard in Ingleside, Texas prior to installation at a Gulf of Mexico permanent site.<sup>1</sup>

According to Section 25.120(a) of the Regulations, “*In circumstances requiring immediate or temporary use of facilities, request may be made for special temporary authority to install and/or operate new or modified equipment....*” 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.*”

In this case, Shell plans to perform Factory Acceptance Testing of a Seatel 9797 antenna prior to installing it a Gulf of Mexico permanent site. It is of paramount importance that the antenna as issue be thoroughly tested to minimize down time once the antenna is installed in a Gulf of Mexico platform. The testing is a circumstance requiring temporary operations. Sound performance of the antenna is in the public interest as satellite communications to Gulf of Mexico platforms are considered life line links to platform personnel. Delay of this testing would injure the public interest.

Pursuant to Section 25.120(b)(4) of the Regulations, the Commission may grant temporary authorization for a period not to exceed 30 days, if the STA request has not been placed on public notice, and an application for regular authority is not contemplated. In this case, because this is a factory acceptance testing operation, Shell does not plan to file an application for permanent authority. However, temporary frequency coordination has been performed prior to this STA request and it is attached to the underlying application. The planned satellite is Satmex-6 (113.0 degrees West).

The requested date for prior use is May 24, 2013. In accordance to Section 25.120(a) of the Regulations, this STA is being filed at least 3 working days prior to the date of proposed operation.

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<sup>1</sup> Shell Communications, Inc. has already obtained a license for the permanent site in the Gulf of Mexico. See Call sign E120179, filename SES-LIC-20120830-00791. The test site at Ingleside, Texas, the subject of this STA request, will have the same transmit characteristics as the permanent site.