

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:

STA - Paumalu, HI 19m Antenna (LEOP) **KA25**

**1. Applicant**

|                   |  |                      |                            |
|-------------------|--|----------------------|----------------------------|
| <b>Name:</b>      | Inmarsat Hawaii Inc.                     | <b>Phone Number:</b> | 202-248-5155               |
| <b>DBA Name:</b>  |  | <b>Fax Number:</b>   | 202-248-5186               |
| <b>Street:</b>    | 1101 Connecticut Avenue NW<br>Suite 1200 | <b>E-Mail:</b>       | diane_cornell@inmarsat.com |
| <b>City:</b>      | Washington                               | <b>State:</b>        | DC                         |
| <b>Country:</b>   | USA                                      | <b>Zipcode:</b>      | 20036                      |
| <b>Attention:</b> | Diane J Cornell                          |                      |                            |




File # SES-STA-20130522-00443  
Call Sign **KA25** Grant Date **7-3-13**  
(or other identifier)  
Term Dates  
From **7-20-13** To: **8-19-13**  
Approved: *Paul E. Hales*

Applicant: Inmarsat Hawaii Inc.  
Call Sign: KA25  
File No.: SES-STA-20130522-00443  
Special Temporary Authority (STA)

Inmarsat Hawaii Inc. (Inmarsat Hawaii) is granted STA, under the following conditions, for 30 days to use its C-band earth station, Call Sign KA25, to conduct telemetry, tracking, and control (TT&C) communications with the Alphasat satellite during its launch and early orbit phase (LEOP). The Alphasat satellite is an Alpha bus C-band/L-band satellite at permanent orbital location 25.0° E.L. The satellite is expected to be launched in late July 2013.

1. Uplink to Alphasat @25.0° E.L on 6338.5 and 6340.5 MHz (Circular LH and RH) within coordinated emission and maximum power eirp 89dBW.
2. Downlink from Alphasat @25.0° E.L on 3949.0 and 3951.0 MHz (Circular LH and RH) .
3. The LEOP operations must be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path. All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs. Currently Inmarsat personel for the 24x7 contact information at the Paumalu, Hawaii ground station for the Alphasat satellite LEOP mission is as follows: Richard Walraven or Derek Lavelle Ph: +1 808 638 5820.
4. All operations shall be on an unprotected and non-harmful interference basis, Inmarsat Hawaii, KA25, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference.
5. In the event that there is a report of interference, Inmarsat Hawaii must immediately terminate transmissions and notify the FCC in writing.
6. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Inmarsat Hawaii's risk.
7. This grant is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release.



Seal of the Federal Communications Commission

UNITED STATES DEPARTMENT OF COMMERCE  
FEDERAL COMMUNICATIONS COMMISSION

File # SES-STA-20130522-00443  
Call Sign KA25 Grant Date 7-3-13  
(or other identifier)  
Term Dates  
From 7-20-13 To 8-19-13  
Approved: Paul E. Allen

**2. Contact**

**Name:** Chris Murphy      **Phone Number:** 202.248.5158  
**Company:** Inmarsat      **Fax Number:**  
**Street:** 1101 Connecticut Ave., NW      **E-Mail:** chris.murphy@inmarsat.com  
Suite 1200  
**City:** Washington      **State:** DC  
**Country:** USA      **Zipcode:** 20036  
**Attention:**      **Relationship:**

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)

3. Reference File Number or Submission ID

4a. Is a fee submitted with this application?

If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

Governmental Entity       Noncommercial educational licensee

Other (please explain):

4b. Fee Classification      CGX – Fixed Satellite Transmit/Receive Earth Station

5. Type Request

Use Prior to Grant

Change Station Location

Other

6. Requested Use Prior Date

07/20/2013

7. City Haleiwa

8. Latitude

(dd mm ss.s h) 21 40 14.6 N

|   |   |
|---|---|
| 9. State HI   | 10. Longitude<br>(dd mm ss.s h) 158 2 3.1 W |
| 11. Please supply any need attachments.<br>Attachment 1: Exhibit A (narrative)      Attachment 2:      Attachment 3:  |   |
| 12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)<br><div style="border: 1px solid black; padding: 10px; min-height: 100px;">See Exhibit A (narrative).</div>  |   |
| 13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.      Yes <input checked="" type="radio"/> No <input type="radio"/> |   |
| 14. Name of Person Signing<br>Diane J Cornell   | 15. Title of Person Signing<br>Director     |
| WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT<br>(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION<br>(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).   |   |

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## Exhibit A

### DESCRIPTION OF STA REQUEST AND PETITION FOR WAIVER OF SECTIONS 25.137 AND 25.114

#### I. DESCRIPTION OF STA REQUEST

Inmarsat Hawaii Inc. (“Inmarsat Hawaii”) hereby requests special temporary authority (“STA”) to use its 19 meter earth station antenna located in Paumalu, Hawaii and operated pursuant to Call Sign KA25 (the “19m Antenna”) to permit C-band telemetry, tracking, and control (“TTAC”) communications with the Alphasat spacecraft during its Launch and Early Orbit Phases (LEOP).<sup>1</sup> Operations of the 19m Antenna during this LEOP period would be consistent with the technical parameters of the existing license for KA25, although Alphasat is not currently a licensed point of communication for the 19m Antenna.

The Alphasat satellite will be launched by an Ariane 5 launch vehicle from the Kourou, French Guyana facility. Inmarsat Hawaii and its affiliates will provide a network of ground stations around the globe that will provide communication with the spacecraft during the LEOP. The Inmarsat Hawaii facility at Paumalu, Hawaii will form part of the Inmarsat Hawaii ground station network for this launch support using the 19m Antenna. Launch is currently scheduled for late July, 2013.

Inmarsat Global, a UK affiliate of Inmarsat Hawaii, will be responsible for the technical aspects of the launch, with support from Astrium (France), using the C-band portion of the satellite prior to its commercial operation. The mission control center will be located at the Inmarsat premises in London, England and all the mission operations will be conducted, under Inmarsat Global control. It is expected that the 19m Antenna will be used intermittently during the first three or four days of support for limited periods when the spacecraft is visible from the Paumalu station.

The final geostationary operational location for Alphasat will be at or near 25° E.L. Before entering commercial service, Alphasat will undergo a one month In-Orbit Test (IOT) phase at the geostationary location of 8° E.L. No on-station operations with Alphasat will be possible from the Paumalu ground station when the satellite is undergoing IOT or once it becomes operational given the lack of visibility to the relevant orbital locations. Therefore, Inmarsat Hawaii’s support to Inmarsat Global Ltd. using the Paumalu station and 19 m Antenna will be limited to the LEOP portion of the mission only.

#### II. TO THE EXTENT THEY APPLY, GOOD CAUSE EXISTS FOR AWAIVER OF CERTAIN PORTIONS OF SECTIONS 25.137 AND 25.114

Inmarsat Hawaii is providing the following legal and technical information to support this STA request and certain waiver requests that are necessary in order to communicate from

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<sup>1</sup> The Alphasat satellite is an Alphabus C-band/L-band satellite (with some additional Technology Demonstration Payloads) designed for operation from the 25° E.L. orbital location.

the 19m Antenna to the Alphasat spacecraft as the spacecraft is not listed as a point of communications on Inmarsat Hawaii's license for the antenna.

Pursuant to Section 25.137 of the Federal Communications Commission's ("Commission" or "FCC") rules, the same technical information required by Section 25.114 for U.S.-licensed space stations, and certain legal information, must be submitted by earth station applicants "requesting authority to operate with a non-U.S. licensed space station to serve the United States..."<sup>2</sup> Inmarsat Hawaii seeks authority to support the needed TTAC during the LEOP of the Alphasat spacecraft from shortly after launch to low earth and transfer orbits. Inmarsat Hawaii does not request authority to provide commercial service to the United States, and thus believes that Section 25.137 does not apply.

To the extent the Commission determines, however, that Inmarsat Hawaii's request for authority to provide LEOP on a special temporary basis is a request to serve the United States with a non-U.S.-licensed satellite, Inmarsat Hawaii respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission's rules, to the extent that Inmarsat Hawaii has not herein provided the information required by these rules.<sup>3</sup> The Commission may grant a waiver for good cause shown.<sup>4</sup> A waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause for a waiver of portions of Section 25.114 exists. Inmarsat Hawaii seeks authority only to conduct LEOP support for Alphasat. Thus, any information sought by Section 25.114 that is not relevant to the LEOP – e.g., antenna patterns, energy and propulsion and orbital debris.

As evidenced by Inmarsat Hawaii's license for the 19m Antenna, Inmarsat Hawaii has the requisite authority to perform the LEOP of the Alphasat satellite, except for the point of communication. Moreover, as with any STA, Inmarsat Hawaii will conduct the operations on an unprotected, non-interference basis.

Because it is not relevant to the service for which Inmarsat Hawaii seeks authorization, Inmarsat Hawaii seeks a waiver of all the technical and legal information required by Section 25.114, to the extent it is not provided herein. As noted above, Inmarsat Hawaii has provided the required information to the extent that it is relevant to the LEOP service for which Inmarsat Hawaii seeks authorization.

Good cause also exists to waive portions of Section 25.137, to the extent the information required is not herein provided. Section 25.137 is designed to ensure that "U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services" in other countries. Here, there is no service being provided by the satellite; Inmarsat Hawaii is simply providing TTAC facilities while the satellite is in transfer orbit on the way to its IOT orbital location and final geostationary orbital location. Thus, the purpose of the information required by Section 25.137 is not implicated here. For example, Section 25.137(d) requires earth station applicants requesting authority to operate with a non-U.S.-

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<sup>2</sup> 47 C.F.R. § 25.137(a).

<sup>3</sup> 47 C.F.R. §§25.137 and 25.114.

<sup>4</sup> 47 C.F.R. §1.3.