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).[1] 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

[1] 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…"[2] 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.[3] The Commission may grant a waiver for good cause shown.[4] 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.-

[2] 47 C.F.R. § 25.137(a).
[3] 47 C.F.R. §§25.137 and 25.114.
[4] 47 C.F.R. §1.3.

licensed space station that is not in orbit and operating to post a bond.[5] The underlying purpose in having to post a bond – i.e., to prevent warehousing of orbital locations by operators seeking to serve the United States – would not be served by requiring Inmarsat Hawaii to post a bond in order to conduct a limited period of LEOP support of the Alphasat satellite.

Inmarsat Global is currently seeking a license for Alphasat from the UK Space Agency of the United Kingdom. That license is expected to be issued approximately one month prior to the anticipated launch date. Alphasat is a commercial communications satellite primarily supporting broadband data services to mobile users in the Middle East, Africa, Europe, and Southwest Asia. The spacecraft is not meant to serve the United States. Thus, the purpose of Section 25.137 – to ensure that U.S. satellite operators enjoy "effective competitive opportunities" to serve foreign markets and to prevent warehousing of orbital locations serving the United States – will not be undermined by grant of this waiver request.

Finally, Inmarsat Hawaii notes that it expects to communicate with the Alphasat satellite using the 19m Antenna for a maximum period of 10 days under nominal launch conditions. Requiring Inmarsat Hawaii to provide technical and legal information, where there is no risk of interference and the operation will normally cease within 10 days is unnecessary and would pose undue hardship without serving underlying policy objectives. Given these particular facts, Inmarsat Hawaii believes that the waiver sought herein is appropriate.

MISSION TECHNICAL PARAMETERS

Earth Station

Inmarsat Hawaii provides the following technical parameters for information only. The operations contemplated in this request fall within the existing license parameters for the 19m Antenna.

EARTH-to-SPACE:

Transmit Frequencies: 6338.5 MHz and 6340.5 MHz
Transmit Polarisation: Circular LH and RH
Maximum EIRP: 89 dBW
Modulation: PCM (NRZ-L)/PSK/FM (800KFXD)
Minimum Elevation for Transmission: 10 degrees

SPACE-to-EARTH:

Receive Frequencies: 3949.0 MHz and 3951.0 MHz
Receive Polarisation: Circular LH and RH
Maximum Spacecraft EIRP: 0 dBW within +/- 70 degrees
Modulation: PCM (NRZ-L)/PSK/PM

[5] 47 C.F.R. §25.137(d)(4).

Azimuth Range: 360 degrees

Duration of Communications: Once or twice a day for a period of a few hours for about three to ten days assuming a nominal launch scenario.

Space Station Coordination

The coordination of communications for the support of the launch of the Alphasat spacecraft with existing spacecraft operators during LEOP operations is the responsibility of Inmarsat Global. Inmarsat Global will undertake coordination of communications for the support of the launch of Alphasat with other spacecraft operators that may be potentially affected during LEOP operations.

Coordination usually commences relatively close to the launch date once the flight path estimate of the new satellite is available. It is common practice that satellite operators co-operate to allow LEOP due to its importance and the relatively short duration of interference if frequency overlap should occur with the existing satellites in orbit.

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Grant of the requested STA will serve the public interest, convenience and necessity because it will enable Inmarsat Hawaii to provide essential TTAC functions to the Alphasat spacecraft, within technical parameters consistent with the licensed parameters of the 19m Antenna, without creating any risk of harmful interference. Inmarsat Hawaii respectfully requests that the Commission grant STA beginning July 20, 2013 for period of 30 days.