

November 11, 2013

Paul Blais 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

Dear Mr. Blais,

Pursuant to Section 25.120(a) of the Rules and Regulations ("Regulations") of the Federal Communications Commission ("Commission"), Global Data Systems, LLC. ("GDS") seeks Commission consideration for a Special Temporary Authority ("STA") to (1) move an existing antenna; and (2) operate two new hubs while an application for modification authority is under review.<sup>1</sup>

According to Section 25.120(b)(3) of the Regulations, the Commission may grant temporary authority for a period not to exceed 60 days, if the STA request has not been placed on public notice, and the applicant plans to file a request for regular authority for the service. In the instant case, the STA request has not been placed on public notice and GDS has filed an application for regular authority. Therefore, GDS respectfully requests an STA for a period not to exceed 60 days.

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 the instant case, GDS plans to move an existing Vertex 7.2m Ku band hub from its current location at 537 Cajundome Blvd., Suite 111, Lafayette, LA 70506 to a new location at 310 Lazer Ln, Lafayette, LA 70506. This Vertex 7.2m antenna supports traffic for hundreds of remote antennas installed at customer offshore location in the Gulf of Mexico. Consequently, the hub provides lifeline communications to the crew aboard vessels and offshore platforms. Therefore, it is in the public interest that communications to the vessel and platform personnel continue uninterrupted.

This STA also requests authority operate two new antennas at the new location; namely, an ASC 9.4m Kuband antenna and an ASC 7.6m Kuband antenna. These new antennas will operate in the standard Kuband (11700-12200 MHz / 14000-14500 MHz) and will be pointed at the AMC-09 (83W) and Intelsat 23 (53W) satellites respectively.

In order to prevent disruption of existing communications to offshore personnel, the requested date for prior use is <u>November 18, 2013</u>. 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.

Because of the nature of operations that these hub support, it is in the public interest that the proposed earth stations be operational to accommodate the critical calls that are placed by platform personnel. In addition, should there be an emergency in this platform; these earth stations would be used to place calls to communicate with the appropriate agencies.

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<sup>&</sup>lt;sup>1</sup> See File ID: IB2013002399