

**EXHIBIT A – REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

RigNet SatCom Inc. (“RigNet”), pursuant to Section 25.120 of the Commission’s Rules, 47 C.F.R. § 25.120, hereby requests Special Temporary Authority (“STA”) for short-term transmit and receive operations of a Seatel 9797 Earth Station on Vessel (“ESV”) terminal operating in the conventional C-band<sup>1</sup> on the Chevron Jack St. Malo (“Malo Terminal”), a U.S.-flagged offshore platform involved in drilling and petroleum production. Although the Malo Terminal is located more than 200 km from the baseline of the United States, frequency coordination has been completed to ensure that any offshore U.S.-licensed fixed microwave installations within a 200 km radius of the ESV terminal’s location will not be affected. STA is sought for a period of 60 days beginning on February 1, 2014.<sup>2</sup>

Stratos Offshore Services Company (“Stratos”) previously obtained STA to operate the Malo Terminal on November 26, 2013 for a period of 30 days,<sup>3</sup> and the Commission later extended this authority through February 9, 2014.<sup>4</sup> Given that the Malo Terminal is part of Stratos’ retail energy business, which RigNet intends to purchase along with certain other assets,<sup>5</sup> and because RigNet intends to close on the aforementioned transaction after having obtained FCC approval for the assignment of the permanent licenses that enable the operation of these assets,<sup>6</sup> separate and independent authority is required for RigNet to assume responsibility for the operation of the Malo Terminal.

The proposed Malo Terminal ESV operations comply with all of the relevant technical parameters and showings required by Section 25.221 of the Commission’s Rules, and there is a pending application to modify Call Sign E980235 to enable the permanent operation of the above-referenced Seatel C-Band ESV antenna.<sup>7</sup> In addition, the Malo Terminal has been successfully coordinated with potentially affected terrestrial fixed service providers.<sup>8</sup>

STA is required because the Chevron Jack St. Malo deepwater drilling and production platform is a newly constructed vessel which has only recently been towed to its current location in international waters in the Gulf of Mexico, and Ku-band ESV service was deemed inadequate for the telemetry, control and tracking (“TT&C”) and data communications needs of the newly

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<sup>1</sup> 3700-4200 MHz space-to-earth and 5925-6425 MHz earth-to-space.

<sup>2</sup> An application is on file to modify Call Sign E980235 to enable the permanent operation of the Malo Terminal. *See* International Bureau File No. SES-MOD-20131112-00965 (“Modification Application”).

<sup>3</sup> *See* International Bureau File No. SES-STA-20131112-00966.

<sup>4</sup> *See* International Bureau File No. SES-STA-20131216-01198.

<sup>5</sup> *See* International Bureau File No. SES-ASG-20130815-00737 (“RigNet Assignment Application”).

<sup>6</sup> The International Bureau approved the RigNet Assignment Application on January 28, 2014.

<sup>7</sup> The proposed STA operations will conform to the technical parameters provided in the pending modification application. *See* Modification Application.

<sup>8</sup> *See* Exhibit B.

launched and untested vessel. Specifically, Chevron and satellite engineers assigned to the project determined that Ku-band communications, which are susceptible to rain fade attenuation in the tropical conditions present in the deep waters of the Gulf of Mexico region, do not provide a sufficient level of reliability for the TT&C and data communications needs of the vessel at its isolated deployment location. In contrast, C-band communications, which are generally not susceptible to rain fade attenuation and other atmospheric anomalies, offer greater reliability in the harsh environment where the new platform is deployed. Given that TT&C and data communications are critical for the safety of personnel living on the platform and for reliable equipment control and environmental monitoring, STA is warranted and in the public interest in this case.

Because the proposed STA operations conform to the parameters in Section 25.221 for routine ESV operations and have been fully coordinated, any adjacent operations will be fully protected. Nevertheless, RigNet will make available a 24/7 point of contact in the event that any issues arise in connection with the operations under the requested STA. Personnel will be on duty at all times during the STA period and can be contacted at (888) 974-4638.