

HG

O3b Limited
SES-STA-20140912-00730 IB2014001818

Approved by OMB
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Bristow (DISA testing) STA - 30 days (Sep 2014)

1. Applicant

Name: O3b Limited **Phone Number:** 202-813-4026

DBA Name: **Fax Number:**

Street: 900 17th Street, NW, #300 **E-Mail:** joslyn.read@o3bnetworks.com

City: Washington **State:**

Country: USA **Zipcode:** -

Attention: Ms Joslyn Read

30 days "With Condition"


File # SES-STA-20140912-00730

Call Sign N/A Grant Date 10/22/2014

(or other identifier)

Term Dates From 10/22/2014 To 11/21/2014

Approved: *Joslyn Read*



GRANTED
International Bureau

CONDITIONS:

Applicant: O3b Limited
File No.: SES-STA-20140912-00730

This special temporary authority (STA) is granted for thirty days from October 22, 2014 for testing and demonstration purpose as described in the application. The grant is on a non-interference basis.


30 days "with conditions"

File # SES-STA-20140912-00730

Call Sign N/A **Grant Date** 10/22/2014
(or other identifier)

Term Dates
From 10/22/2014 **To:** 11/21/2014

Approved: Paul E. Blais



The stamp is a red rectangular seal from the Federal Communications Commission. It features the FCC logo at the top, the word "GRANTED" in large bold letters in the center, and "International Bureau" at the bottom.

2. Contact			
Name:	Joseph A. Godles	Phone Number:	202-429-4900
Company:	Goldberg Godles Wiener & Wright LLP	Fax Number:	202-429-4912
Street:	1229 19th Street, NW	E-Mail:	jgodles@g2w2.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20036 -2413
Attention:		Relationship:	Legal Counsel
(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?			
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).			
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee			
<input type="radio"/> Other(please explain):			
4b. Fee Classification CGX – Fixed Satellite Transmit/Receive Earth Station			
5. Type Request			
<input type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other			
6. Requested Use Prior Date			
10/20/2014			

7. City Bristow	8. Latitude (dd mm ss.s h) 38 47 0.0 N
9. State VA	10. Longitude (dd mm ss.s h) 77 34 25.8 W
11. Please supply any need attachments. Attachment 1: STA request 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.) <div style="border: 1px solid black; padding: 5px;">O3b Limited hereby requests Special Temporary Authority to operate an earth station to be located at its Bristow, Virginia facility that will communicate with its satellite system. O3b seeks a 30-day STA for the period between October 20, 2014 and November 19, 2014.</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 Joslyn Read	15. Title of Person Signing Vice President, Regulatory Affairs
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).	

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

O3b Limited (“O3b”), pursuant to Section 25.120 of the Commission’s rules, hereby respectfully requests special temporary authority (“STA”) to operate an earth station to be located at its Bristow, Virginia facility (“Bristow 1.2-m Earth Station”) that will communicate with its satellite system.¹ In this filing, O3b seeks a 30-day STA for the period between October 20, 2014 and November 19, 2014.

The Bristow 1.2-m Earth Station will be used for non-commercial testing and demonstration purposes. The Bristow 1.2-m Earth Station will enable O3b to test potential applications of the O3b satellite system, including interactive video teleconferencing, interactive access to complex web content from the Internet and very large file transfers. As discussed below, grant of the requested authority is in the public interest as it will allow O3b to test and evaluate O3b services that could benefit the U.S. Department of Defense.

Test Details and Public Interest Showing

The Bristow 1.2-m Earth Station will communicate with O3b’s UK-authorized, Ka-band, Medium Earth Orbit, non-geostationary satellite orbit (“NGSO”) Fixed-Satellite Service (“FSS”) system² and O3b’s gateway earth station in Vernon, TX.³

The frequencies to be used by the Bristow 1.2-m Earth Station are:

- 28.35-28.4 GHz, 28.6-29.1 GHz (uplink)
- 18.3-18.6 GHz, 18.8-19.3 GHz (downlink)

The Bristow 1.2-m Earth Station will consist of two (2) 1.2-m Orbit antennas. O3b has previously been granted an STA to operate an identical 1.2-m earth station at the CODA Lab location in San Diego, California⁴ and has requested STAs to operate an identical earth station at the Data Technology Solution (“DTS”) facility in Breaux Bridge, Louisiana⁵ and at Oil Comm 2014.⁶

¹ O3b notes that it currently has special temporary authority to operate two (2) 2.4-m antennas from its Bristow facility (FCC Call Sign E130107; most recently extended under FCC File No. SES-STA-20140514-00357, granted June 30, 2014). The instant request is not in any way related to the activities performed by O3b’s 2.4-m antennas under the terms of that STA.

² O3b’s first four satellites were launched on June 25, 2013. O3b’s next batch of four satellites was launched on July 10, 2014.

³ See O3b Limited, Call Sign E130021, File No. SES-LIC-20130124-00089, granted June 20, 2013 (“O3b Texas License”).

⁴ See O3b Limited, File No. SES-STA-20131228-01209, filed December 23, 2013 (“O3b CODA STA Application”), and which was placed on Public Notice on April 2, 2014 and granted on April 29, 2014.

⁵ See O3b Limited, File No. SES-STA-20140731-00627, filed July 31, 2014 (“O3b DTS STA Application”).

⁶ See O3b Limited, File No. SES-STA-20140819-00666, filed Aug. 19, 2014 (“O3b Oil Comm STA Application”).

In the current instance, STA is sought for O3b to integrate and test the antennas at its Bristow facility prior to demonstrations at nearby Department of Defense facilities for which O3b has already submitted applications for STA.⁷

The Bristow 1.2-m Earth Station antennas will be mounted on a temporary fixed platform. Although the pointing angle of the antennas will change as O3b's in-orbit satellites are tracked, the platform will remain stationary during the demonstration.

Grant of this application will serve the public interest, convenience and necessity by allowing O3b to prepare for demonstration of how its system can effectively deliver high bandwidth network connectivity to Department of Defense facilities and employees. O3b will demonstrate the advantages of its system's high throughput and low latency for providing a variety of valuable communications services, including voice, data transfers and video conferencing using connected devices.

The O3b Satellite System

In its initial FCC application, which sought authority for a gateway earth station located in Hawaii, O3b stated that it planned to operate eight NGSO satellites that would be spaced equally, *i.e.*, at 45° intervals.⁸ The Commission granted this application.⁹

O3b has filed an application seeking to modify its Hawaii license to give it the flexibility to operate up to two of its eight NGSO satellites as in-orbit spares.¹⁰ The remaining satellites would be equally spaced in O3b's authorized orbital plane, and each in-orbit spare would be co-located with a non-spare satellite.¹¹ O3b has been granted an STA pending action on its modification application.¹²

Earth Station Technical Parameters

The following documents containing technical details of the operations proposed under the requested STA are attached:

⁷ See O3b Limited, File No. SES-STA-20140903-00686, filed Sep. 3, 2014 ("O3b Ft. Belvoir STA Application") and File No. SES-STA-INTR2014-01801, filed Sep. 11, 2014 ("O3b St. Inigoes STA Application")

⁸ See Application for Hawaii Earth Station, File No. SES-LIC-20100723-00952, Legal Narrative, Section III and Attachment A thereto (Technical Statement), Section A.2.

⁹ See O3b Limited, Call Sign E100088, File No. SES-LIC-20130124-00089, granted Sept. 25, 2012 ("O3b Hawaii License").

¹⁰ See O3b Limited, Call Sign E100088, File No. SES-STA-20140814-00656. *See also* O3b Limited, Call Sign E100088, File No. SES-MOD-20140814-00652.

¹¹ No changes were sought to the technical parameters identified in the licenses and STAs held by O3b and its customers. No changes were made to O3b's Schedule S, either, but O3b noted that the number of satellites and phase angles in Section S4 and S5 of Schedule S will vary to the extent that O3b operates one or more in-orbit spare satellites.

¹² See O3b Limited, Call Sign E100088, File No. SES-STA-20140814-00656.

- Annex 1: FCC Form 312, Schedule B. O3b proposes to operate the Bristow 1.2-m Earth Station during this 30-day term in accordance with the parameters specified in the attached Schedule B.¹³
- Annex 2: Link Budgets. Representative links for the Bristow 1.2-m Earth Station are provided.
- Annex 3: Characteristics of the 1.2-m Orbit Antenna are provided for the Commission's convenience. O3b previously submitted this information to the Commission.¹⁴

Further, O3b incorporates by reference the following technical parameters previously provided by O3b:

- Schedule S. In its application for a gateway earth station in Hawaii, O3b submitted a Schedule S describing its satellite system's technical characteristics.¹⁵ The Schedule S correctly described the O3b satellite system for that application, and numerically enveloped all of the necessary parameters for future earth station applications. In order to assist the Commission in processing present and future applications, O3b subsequently provided a modified Schedule S that incorporates additional information submitted to the Commission since the Hawaii application was filed.¹⁶ O3b will operate its Bristow 1.2-m Earth Station within the parameters described in O3b's modified Schedule S.
- U.S. Government Coordination. O3b has completed all necessary coordination with U.S. government satellite networks operating in Ka-band, including GSO and NGSO networks, as well as their associated specific earth stations filed under 9.7A and 9.7B of the ITU Radio Regulations through other administrations. O3b has also completed coordination, according to US footnote 334 of the FCC table of frequency allocations, with the U.S. government, and this US334 coordination agreement specifically provides for additional earth stations in U.S. territory operating with O3b's satellites, such as the Bristow 1.2-m Earth Station. As a result, O3b's existing US334 coordination agreement covers the use of the Bristow 1.2-m Earth Station as requested in this application.
- Antenna Patterns. O3b previously submitted measured 30 GHz band antenna performance data for the 1.2-m Orbit antenna to the Commission in the Coda Lab STA request¹⁷ and the pending DTS and Oil Comm STA requests.¹⁸

¹³ O3b is providing a Schedule B containing technical parameters for the Commission's convenience.

¹⁴ See O3b blanket maritime earth station application, File No. SES-LIC-20130528-00455, Technical Attachment at A.6. See also O3b DTS STA Application; O3b Oil Comm STA Application.

¹⁵ See O3b Limited, Call Sign E100088, File No. SES-LIC-20100723-00952, granted Sept. 25, 2012 ("O3b Hawaii License").

¹⁶ See O3b Limited, Call Sign E130098, File No. SES-AMD-20131025-01138 ("O3b ESV Answers").

¹⁷ See O3b Limited, File No. SES-STA-20131228-01209, filed December 23, 2013 ("O3b CODA STA Application"), and which was placed on Public Notice on April 2, 2014 and granted on April 29, 2014.

¹⁸ See O3b DTS STA Application. See also O3b Oil Comm STA Application.

Proposed Spectrum Use

O3b's proposed Bristow 1.2-m Earth Station operations in shared bands are consistent with the Commission's rules and policies. O3b addresses each of these bands below.

UPLINK

28.35-28.4 GHz – Secondary uplink band shared with primary GSO FSS stations.

In the 28.35-28.4 GHz band, there is a primary allocation for GSO FSS systems and a secondary allocation for NGSO FSS systems. O3b's Bristow 1.2-m Earth Station transmissions in this band will be consistent with their secondary status vis-à-vis GSO FSS transmissions. The Commission has allowed similar secondary use of frequencies in the Ka-band uplink allocated to GSO FSS on a primary basis where applicants are prepared to accept interference from primary operations and can demonstrate that their proposed operations are not likely to cause harmful interference to primary operations.¹⁹ O3b agrees to both of these standards.

As a secondary user of the 28.35-28.4 GHz band in the United States, O3b makes no claim of protection from interference from U.S.-licensed GSO FSS networks in this band segment. As for O3b's uplink operations in the 28.35-28.4 GHz band, the ITU has developed uplink equivalent power flux density limits ("EPFD_{up}") limits to protect co-frequency GSO FSS operations from unacceptable interference from NGSO FSS systems operating in the same frequencies. Specifically, in accordance with Article 22 of the ITU Radio Regulations, if the applicable EPFD_{up} limits are met, the NGSO FSS satellite system is considered to have met its obligations to protect GSO FSS networks from unacceptable interference. O3b demonstrated that its gateway located at Hawaii operating at the authorized power levels will meet the applicable ITU EPFD_{up} limits in all frequency ranges where these limits apply, due to the inherent angular separation between the O3b and geostationary orbits when viewed from the Earth at latitudes away from the equator.²⁰

The Bristow 1.2-m Earth Station is located further north in latitude than the Hawaii gateway,²¹ which results in an even greater angular separation between the O3b and geostationary orbits as viewed from the Earth and an even greater assurance that the applicable ITU EPFD_{up} limits will be met by O3b's proposed operations. The proposed Bristow 1.2-m Earth Station operations, therefore, also will meet the applicable ITU EPFD_{up} limits. In any event, O3b confirms that its operations will be on a secondary basis relative to U.S.-licensed GSO FSS networks in the same band.

¹⁹ *Northrop Grumman Space & Missions Systems Corporation*, 24 FCC Rcd 2330, at ¶¶ 72-73 (Int'l Bur. 2009); *contactMEO Communications, LLC*, 21 FCC Rcd 4035, at ¶¶ 23-24, (Int'l Bur., 2006).

²⁰ O3b Hawaii License Application, FCC File No. SES-LIC-20100723-00952, Technical Attachment at A.10.1.

²¹ The O3b Hawaii gateway latitude is 21° 40' 17.8" N; the Bristow Earth Station latitude is 38° 47' 0" N.

28.6-29.1 GHz – Primary uplink band for licensed NGSO FSS Systems.

Under the Commission’s Ka-band frequency plan, the frequencies 28.6-29.1 GHz may be used on a primary basis by licensed NGSO FSS systems.²² O3b recognizes, however, that operations under an STA for the Bristow 1.2-m Earth Station demonstrations will be on a secondary, non-harmful interference basis. As shown below, the Bristow 1.2-m Earth Station demonstrations will provide the requisite protection to allocated services operating in this band.

Avoidance of interference to GSO FSS systems. The proposed demonstrations will not cause any interference into, or require protection from, any co-frequency GSO satellites. As previously shown,²³ there is an inherent angular separation between the O3b and GSO arcs from the perspective of earth stations located away from the equator. The Bristow 1.2-m Earth Station is located further north in latitude than the Hawaii gateway,²⁴ which results in an even greater angular separation between the O3b and geostationary orbits as viewed from the Earth. This means that the angular separation between the O3b and GSO arcs from the Bristow 1.2-m Earth Station will be greater than the 7 degree separation accepted by the Commission when it approved O3b’s Hawaii gateway. This ensures that GSO FSS systems will be adequately protected.

Avoidance of interference to or from Fixed Service (i.e., terrestrial) stations. Interference from the O3b Bristow 1.2-m Earth Station transmissions into U.S. terrestrial Fixed Service (“FS”) receivers in the 28 GHz band is a non-issue because there is no allocation in the Commission’s Ka-band Frequency Plan for FS stations operating in the 28.6-29.1 GHz band in the United States.²⁵

DOWNLINK

18.3-18.6 GHz – Non-conforming downlink band shared with primary GSO FSS stations.

The 18.3-18.6 GHz band is allocated in the United States on a primary basis to GSO FSS. In the 18.3-18.6 GHz downlink band, the ITU has developed downlink equivalent power flux density (“EPFD_{down}”) limits to protect GSO FSS networks from unacceptable interference from NGSO FSS systems operating in the same frequencies. Specifically, in accordance with Article 22 of the ITU Radio Regulations, if the applicable EPFD_{down} limits are met, the NGSO FSS satellite system is considered to have met its obligations to protect GSO FSS networks from unacceptable interference. O3b confirms

²² See *In the Matter of Rulemaking to Amend Parts 1, 2, 21, and 25 of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services*, 11 FCC Rcd. 19005, ¶¶59-62 and 79 (1996). See also *In the Matter of Redesignation of the 17.7-19.7 GHz Frequency Band, Blanket Licensing of Satellite Earth Stations in the 17.7-20.2 GHz and 27.5-30.0 GHz Frequency Bands, and the Allocation of Additional Spectrum in the 17.3-17.8 GHz and 24.75-25.25 GHz Frequency Bands for Broadcast Satellite-Service Use*, 15 FCC Rcd 13430, ¶ 28 (2000).

²³ O3b Hawaii License Application, FCC File No. SES-LIC-20100723-00952, Technical Attachment at A.10.1.

²⁴ See n. 21, *supra*.

²⁵ See *In the Matter of Verizon Washington D.C., Application for Renewal of License for Common Carrier Fixed Point to Point Microwave Station KGC79*, 26 FCC Rcd 13511, 13516 (WTB 2011).

that its system will meet the applicable ITU EPFD_{down} limits in all frequency ranges where these limits apply.²⁶

As an example of how these limits will be satisfied, O3b provided EPFD_{down} calculations for transmissions to its Hawaii gateway earth station.²⁷ O3b also showed how the EPFD_{down} limits can be satisfied at all latitudes.²⁸ Compliance with the EPFD_{down} limits is even more easily achieved in the case of transmissions to O3b's Bristow 1.2-m Earth Station than it is in the case of transmissions to O3b's Hawaii earth station. O3b is able to satisfy the limits by taking advantage of the inherent angular separation of the O3b and the GSO orbits when viewed from the surface of the Earth at latitudes away from the equator,²⁹ and O3b's Bristow 1.2-m Earth Station will be located further from the equator than O3b's Hawaii earth station. The Bristow 1.2-m Earth Station location, therefore, presents a strong case for non-interference to GSO FSS networks.

18.8-19.3 GHz – Primary downlink band for licensed NGSO FSS Systems.

Under the Commission's Ka-band frequency plan, the frequencies 18.8-19.3 GHz may be used on a primary basis by licensed NGSO FSS systems.³⁰ O3b recognizes, however, that operations under an STA for the Bristow 1.2-m Earth Station demonstrations will be on a secondary, non-harmful interference basis. The Bristow 1.2-m Earth Station demonstrations will provide the requisite protection to GSO FSS networks and terrestrial stations operating in this band.

Avoidance of interference to GSO FSS systems. This band is not allocated for GSO FSS networks.³¹ Nevertheless, the proposed demonstrations will not cause any interference into, or require protection from, any co-frequency GSO satellites. As previously shown,³² there is an inherent angular separation between the O3b and GSO arcs from the perspective of earth stations located away from the equator. As mentioned above, the Bristow 1.2-m Earth Station is located further north in latitude than the Hawaii gateway, which results in an even greater angular separation between the O3b and geostationary orbits as viewed from the Earth. This means that the angular separation between the O3b and GSO arcs from the Bristow 1.2-m Earth Station will be greater than the 7 degree separation accepted by the

²⁶ See ITU Radio Regulations, Article 22. See also O3b Hawaii License Application, FCC File No. SES-LIC-20100723-00952, Technical Attachment at A.10.1 for a discussion of O3b's compliance with the operational limits in Article 22 of the ITU Radio Regulations. See also Letter from Brian D. Weimer, to Marlene H. Dortch, in re O3b Application for Hawaii Earth Station, File No. SES-LIC-20100723-00952 (Apr. 22, 2011), Annex A.

²⁷ O3b Hawaii License Application, FCC File No. SES-LIC-20100723-00952, Technical Attachment at A.10.1.

²⁸ See id.

²⁹ See id.

³⁰ See *In the Matter of Rulemaking to Amend Parts 1, 2, 21, and 25 of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services*, 11 FCC Rcd. 19005, ¶¶59-62 and 79 (1996). See also *In the Matter of Redesignation of the 17.7-19.7 GHz Frequency Band, Blanket Licensing of Satellite Earth Stations in the 17.7-20.2 GHz and 27.5-30.0 GHz Frequency Bands, and the Allocation of Additional Spectrum in the 17.3-17.8 GHz and 24.75-25.25 GHz Frequency Bands for Broadcast Satellite-Service Use*, 15 FCC Rcd 13430, ¶ 28 (2000).

³¹ See id.

³² O3b Hawaii License Application, FCC File No. SES-LIC-20100723-00952, Technical Attachment at A.10.1.

Commission when it approved O3b's Hawaii gateway. This ensures that GSO FSS systems will be adequately protected.

However, because the demonstrations O3b proposes in this STA request will be conducted on a secondary basis, O3b agrees to accept any interference that its Bristow 1.2-m Earth Station may receive from 18.8-19.3 GHz band GSO FSS networks

Avoidance of interference to or from Fixed Service (i.e., terrestrial) stations. FS stations operating in the 18.8-19.3 GHz band are no longer co-primary with FSS users in this band.³³ However, because the demonstrations O3b proposes in this STA request will be conducted on a secondary basis, O3b agrees to accept any interference that its Bristow 1.2-m Earth Station may receive from 18.8-19.3 GHz band FS stations. O3b will protect the 18.8-19.3 GHz band FS stations by complying with the space station PFD limits specified in Section 25.208 of the FCC rules.

Conclusion

The requested STA will allow O3b to evaluate and demonstrate the O3b system's operational capabilities and will not result in harmful interference to other authorized spectrum users. Accordingly, and for good cause shown, O3b respectfully requests that its STA be granted in time for it to commence testing under this 30-day STA on October 20, 2014.

³³ See 47 C.F.R. § 101.85(b)(2).