

## REQUEST FOR SPECIAL TEMPORARY AUTHORITY

O3b Limited (“O3b”), pursuant to Section 25.120 of the Commission’s rules, respectfully requests special temporary authority (“STA”) to add the four new satellites that are described below (the “Four New Satellites”) as points of communication for its Hawaii gateway earth station (the “Hawaii Gateway”), E100088, during the 30-day period between December 18, 2014, and January 17, 2015.

O3b operates a U.K.-authorized, non-geostationary orbit (“NGSO”) Fixed-Satellite Service (“FSS”) system in the Ka-band. O3b has eight satellites in orbit: O3b’s first four satellites were launched in June 2013, and an additional four satellites were launched on July 10, 2014 (collectively, the “Eight Operating Satellites”). The Four New Satellites are scheduled to be launched on December 18, 2014, and they will use the same orbital plane, altitude, frequencies, and satellite design as the Eight Operating Satellites.<sup>1</sup>

On October 29, 2014, O3b filed a Petition for Declaratory Ruling (“PDR”) seeking access to the U.S. market for its Four New Satellites.<sup>2</sup> Assuming the Commission issues a Declaratory Ruling, the earth stations the Commission has authorized to communicate with O3b’s Eight Operating Satellites also will have authority to communicate with O3b’s Four New Satellites.

Until the Commission issues a Declaratory Ruling, however, O3b will require other authority to conduct telemetry, tracking and command (“TT&C”) for the Four New Satellites. Grant of the STA requested herein will enable O3b to use its Hawaii Gateway to provide TT&C to the Four New Satellites on an interim basis. The Hawaii Gateway is the only U.S.-licensed earth station that will be used for TT&C during the period covered by the STA request. O3b will use an earth station located in Greece to conduct in-orbit testing.

In its PDR, O3b provided detailed information demonstrating that adding the Four New Satellites to O3b’s system would not create the potential for harmful interference to U.S.-licensed satellite and terrestrial systems. O3b made this showing in a legal narrative,<sup>3</sup> a technical statement,<sup>4</sup> and a Schedule S.<sup>5</sup> The showing, which O3b hereby incorporates by reference, demonstrates that O3b can add four satellites with the same orbital plane, altitude, frequencies and satellite design as the Eight Operating Satellites without causing harmful interference. Grant of the STA, therefore, will not create the potential for harmful interference to U.S.-licensed satellite and terrestrial systems. In any event, O3b acknowledges that operations pursuant to the STA will be on a secondary, non-harmful interference basis.

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<sup>1</sup> The Commission has authorized the Eight Operating Satellites to serve the United States by granting various earth station applications, including the application for O3b’s Hawaii Gateway, that specify O3b’s satellite system as a point of communication. The Commission also has granted O3b special temporary authority, and O3b has sought regular authority, for up to two of the Eight Operating Satellites to serve as spares, with the remaining satellites evenly distributed in O3b’s authorized orbital plane. See FCC File Nos. SES-STA-20140814-00656, SES-STA-20140814-00657, SES-STA-20140814-00658, SES-MOD-20140814-00652, SES-MOD-20140814-00654, SES-MOD-20140814-00655, and SES-AMD-20140814-00653.

<sup>2</sup> See FCC File No. SAT-LOI-20141029-00118 (“PDR”).

<sup>3</sup> See PDR at 6-10.

<sup>4</sup> See Attachment A to PDR at A.8.3 and A.8.4.

<sup>5</sup> See Schedule S to PDR at S17.

**Conclusion**

The requested STA will allow O3b to provide TT&C to the Four New Satellites, which is in the public interest because it will pave the way for the improved service, based on additional satellites, that is described in O3b's PDR. Accordingly, and for good cause shown, O3b asks that its STA request be granted.