

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Hawaii TT&C interim operations (Dec 2014)

1. Applicant

| | | | |
|-------------------|---------------------------|----------------------|--------------------------------|
| Name: | O3b Limited | Phone Number: | 202-813-4026 |
| DBA Name: | | Fax Number: | |
| Street: | 900 17th Street, NW, #300 | E-Mail: | suzanne.malloy@o3bnetworks.com |
| City: | Washington | State: | |
| Country: | USA | Zipcode: | |
| Attention: | Ms Suzanne Malloy | | |


with conditions
File # SES-STA-20141203-00881
Call Sign E10088 Grant Date 12/15/2014
(or other identifier) Term Dates
From 12/18/2014 To: 11/7/2015
Approved: Suzanne Malloy



Applicant: O3b Limited
Call Sign: E100088
File No.: SES-STA-20141203-00881
Special Temporary Authority (STA)

O3b Limited is granted, under the following conditions, special temporary authority for 30 days, beginning December 18, 2014 to operate its fixed earth station, E100088, in Haleiwa, HI, with four new O3B-A Equatorial NGSO satellites that are scheduled to be launched on December 18, 2014.

1. Operations are limited to authority to conduct telemetry, tracking and command ("TT&C") for the four new satellites pending Commission action on IBFS File No SAT-LOI-20141029-00118.
2. Operations with four new satellites shall be limited to current emission on power levels authorized for E100088.
3. All operations shall be on an unprotected and non-harmful interference basis. O3b Limited, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference.
4. In the event that there is a report of interference, O3b Limited must immediately terminate transmissions and notify the FCC in writing.
5. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future O3b Limited applications.
6. This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately.

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|  GRANTED International Bureau | File # <u>SES-STA-20141203-00881</u> |
| | Call Sign <u>E100088</u> Grant Date <u>12/15/2014</u> (or other identifier) |
| | Term Dates From <u>12/18/2014</u> To: <u>1/17/2015</u> |
| | Approved: <u>Paul E. Blythe</u> |
| | |

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 St., 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?

If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

Governmental Entity Noncommercial educational licensee

Other (please explain):

4b. Fee Classification CGX – Fixed Satellite Transmit/Receive Earth Station

5. Type Request

Use Prior to Grant

Change Station Location

Other

6. Requested Use Prior Date
12/18/2014

| | | | |
|---|---------|---|--------------|
| 7. City | Haleiwa | 8. Latitude (dd mm ss.s h) | 21 40 17.8 N |
| 9. State | HI | 10. Longitude (dd mm ss.s h) | 158 1 54.9 W |
| 11. Please supply any need attachments. Attachment 1: STA request | | Attachment 2: | |
| Attachment 3: | | Attachment 3: | |
| <p>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.)</p> <div style="border: 1px solid black; padding: 5px;"> <p>Applicant herein seeks authority to add four new satellites as points of communication for its Hawaii gateway earth station for the period between December 18, 2014 and January 17, 2015.</p> </div> | | | |
| <p>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 &quot;party to the application&quot;; for these purposes.</p> | | | |
| 14. Name of Person Signing Suzanne Malloy | | 15. Title of Person Signing Vice-President, Regulatory Affairs | |
| <p>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).</p> | | | |

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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, 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.¹

On October 29, 2014, O3b filed a Petition for Declaratory Ruling (“PDR”) seeking access to the U.S. market for its Four New Satellites.² 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,³ a technical statement,⁴ and a Schedule S.⁵ 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.

¹ 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.

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

³ See PDR at 6-10.

⁴ See Attachment A to PDR at A.8.3 and A.8.4.

⁵ 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.