

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:  
Paumalu STA Extension for Feeder Links from 14F1

1. Applicant

Name:	Inmarsat Hawaii Inc.	Phone Number:	202-248-5158
DBA Name:		Fax Number:	202-248-5177
Street:	1101 Connecticut Avenue NW Suite 1200	E-Mail:	chris.murphy@inmarsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20036
Attention:	Christopher Murphy		

60 days "With conditions"

File# SES-STA-20141208-00887

Call Sign KA25 Grant Date 01/15/2015  
(or other identifier)

Term Dates From 01/15/2015 To: 09/15/2015

Approved: *Paul E. Hutto*




Applicant: Inmarsat Hawaii Inc.  
Call Sign: KA25  
File No.: SES-STA-20141208-00887  
Special Temporary Authority (STA)

Inmarsat Hawaii Inc. is granted a 60 days extension from SES-STA-20140225-00119, to operate feeder links to the Inmarsat-4F1 satellite at the 143.5° E. L. orbital location from its Paumalu, Hawaii gateway facility, call sign, KA25 to complete the transition to the Auckland, New Zealand. Operations are authorized on the 6425-6575 MHz frequency (Earth-to-space) and 3550-3600 MHz (space-to-Earth) frequency bands.

1. Downlink operations are limited to emission designators: 50K0G7W, 50K0D7W, 25K0G7W, 200KD7W, and 200KG7W. Uplink operations are limited to the 200KG7W emission designator with maximum eirp per carrier of 80.70 dBW and maximum eirp density of 63.70 dWB/4kHz.
2. All operations shall be on an unprotected and non-harmful interference basis. Inmarsat Hawaii, Inc., shall not cause harmful interference to, and shall not claim protection from interference caused to it by any other lawfully operating stations.
3. In the event of any harmful interference under this grant of special temporary authority, Inmarsat Hawaii Inc. must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event
4. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future Inmarsat Hawaii Inc. applications,
5. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Inmarsat Hawaii Inc.'s risk.
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.

*60 days*                      *"with conditions"*

 <b>GRANTED</b> International Bureau	<b>File #</b> <u>SES-STA-20141208-00887</u>
	<b>Call Sign</b> <u>KA25</u> <b>Grant Date</b> <u>01/15/2015</u> (or other identifier)
	<b>Term Dates</b> <b>From</b> <u>01/15/2015</u> <b>To:</b> <u>03/15/2015</u>
	<b>Approved:</b> <u>Paul E. Blair</u>

<b>2. Contact</b>	
<b>Name:</b> Chris Murphy	<b>Phone Number:</b> 202-248-5158
<b>Company:</b> Inmarsat Hawaii Inc.	<b>Fax Number:</b> 202-248-5186
<b>Street:</b> 1101 Connecticut Avenue NW Suite 1200	<b>E-Mail:</b> chris.murphy@inmarsat.com
<b>City:</b> Washington	<b>State:</b> DC
<b>Country:</b> USA	<b>Zipcode:</b> 20036
<b>Attention:</b> Chris Murphy	<b>Relationship:</b> Same
(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 SESSTA2014022500119 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 12/20/2014	
7. City Haleiwa	
8. Latitude (dd mm ss.s h) 21 40 14.6 N	

9. State HI	10. Longitude (dd mm ss.s h) 158 2 3.1 W
11. Please supply any need attachments. Attachment 1: Request for STA Exte 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; margin: 5px 0;">Inmarsat Hawaii Inc., seeks extended STA for gateway call sign KA25 to operate feeder links from Inmarsat-4F1 at 143.5 degrees E.L. for a period of three months commencing on December 20, 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 Chris Murphy	15. Title of Person Signing Director
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).	

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Inmarsat Hawaii Inc.  
KA25  
Request for STA

### **Request for Extension of Special Temporary Authority and Continuing Waiver Request**

Inmarsat Hawaii Inc. (“Inmarsat”) requests extension of special temporary authority (“STA”) to use its gateway antenna facility in Paumalu, Hawaii, licensed under call sign KA25 (“Paumalu Gateway”) for feeder downlinks in the 3550-3600 MHz band from the Inmarsat-4F1 satellite (“I4F1”) at the 143.5° E.L. orbital location. Despite its best efforts to complete the transition to the Auckland, New Zealand gateway, Inmarsat is not in a position to transition the traffic from the satellite at this point in time or by the time that the current STA will expire. It is anticipated that Inmarsat will need an additional three months to complete the transition after the expiration of the current STA. Inmarsat, therefore, requests this extended authority for a period of three months commencing on December 20, 2014.

The I4F1 satellite previously conducted its feeder link operations using a gateway located in Subic Bay, Philippines, but is transitioning to a new gateway facility in Auckland, New Zealand. As part of this transition, the ground system in Subic Bay has been removed, and is in the process of being reinstalled and tested in Auckland. During this transition, the I4F1 satellite must use an alternate site for the operation of its feeder links, and Inmarsat has been using the Paumalu Gateway as it is the most suitable site for this interim operation.<sup>1</sup> I4F1 currently is authorized as a point of communication for the Paumalu Gateway.<sup>2</sup> The Paumalu Gateway is licensed to operate in certain portions of the C-Band, but is not authorized to operate on frequencies below 3600 MHz.

Inmarsat seeks to extend the current STA to operate the Paumalu Gateway on the 3550-3600 MHz downlink band using the following emission designators (same as previous request):

50K0G7W  
50K0D7W  
25K0G7W  
200KD7W  
200KG7W

Feeder uplinks to I4F1 will be operated in the 6425-6575 MHz band, using parameters that are within the scope of the existing license. Specifically, the uplinks will use an emission designator of 200KG7W at a maximum EIRP/carrier of 80.70 dBW and a maximum EIRP density of 63.70 dBW/4kHz.

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<sup>1</sup> On April 22, 2014, the Commission granted Inmarsat a 180 day STA beginning June 1, 2014 (File No. SES-STA-20140225-00119), with conditions, to operate feeder links using the KA25 antenna with the Inmarsat-4 F1 satellite at the 143.5 degrees E.L. orbital location.

<sup>2</sup> The I4F1 satellite operates pursuant to authority from the United Kingdom. The Commission previously has reviewed and granted market access for I4F1 at the 143.5° E.L. location. *See, e.g.*, IBFS File Nos. SES-MFS-20080228-00207; SES-LIC-20080306-00242.

During the extended STA operations, I4F1 will continue to be configured to use the 3550-3600 MHz band for feeder downlinks. This band is allocated in Region 3 for FSS on a co-primary basis. However, in the U.S., this band is allocated for radiolocation and radionavigation, and does not include an allocation for FSS. Thus, Inmarsat seeks a waiver of the U.S. Table of Allocations, 47 C.F.R. § 2.106, to allow feeder downlinks in the 3550-3600 MHz band for the proposed interim operations.

Continued grant of the waiver to allow operations of the Paumalu Gateway in the 3550-3600 MHz band “would better serve the public interest than strict adherence to the general rule.”<sup>3</sup> The I4F1 satellite is configured to support feeder link operations in the frequency range 3550-3600 MHz band. In order to continue commercial operations on the satellite, it is not feasible to reconfigure the satellite to use feeder links in other frequency bands while the gateway is being transitioned. In addition, due to the existing heavy traffic load on the satellite, Inmarsat would be unable to move the downlinks to frequencies above 3600 MHz without displacing service operations. Thus, continued grant of the waiver will enable the provision of service to customers on the I4F1 during the final phase of the gateway transition. Thus, good cause exists for the Commission to continue grant of the waiver.<sup>4</sup>

At the same time, grant of the waiver “would not undermine the policy objective of the rule in question and would otherwise serve the public interest.”<sup>5</sup> Inmarsat is aware that the 3550-3600 MHz band is used by U.S. federal government radar systems.<sup>6</sup> Continued grant of the waiver and STA will not cause harmful interference into operations in the 3550-3600 MHz band. The I4F1 feeder downlinks consist of a global beam that already covers Paumalu, whose pfd levels and coverage area will not change as a result of the proposed extended STA operations, and thus, the interference environment for operators in the 3550-3600 MHz band will remain the same. Inmarsat will continue to operate in this band on a non-interference basis. Further, Inmarsat’s receive operations in the 3550-3600 MHz band at the Paumalu Gateway will not be subject to any interference protection and will be limited to the duration of the I4F1 gateway transition. Inmarsat understands the potential for interference from U.S. government uses of the 3550-3600 MHz band into the proposed operations and accepts the risk of such interference. Inmarsat has experience managing the Paumalu Gateway receiver operations on a non-protected basis with respect to U.S. government users in the vicinity.

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<sup>3</sup> See *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969).

<sup>4</sup> See 47 C.F.R. § 1.3.

<sup>5</sup> *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1166 (D.C. Cir. 1990); see also *Fugro-Chance, Inc.*, 10 FCC Rcd 2860, at ¶ 2 (1995) (waiver of U.S. Table of Frequency Allocations is appropriate “where there is little potential for interference into any service authorized under the Table of Frequency Allocations and when the non-conforming operator accepts any interference from authorized services.”).

<sup>6</sup> Inmarsat acknowledges that this request is subject to review by NTIA through the IRAC process.

Moreover, grant of this STA extension will facilitate a smooth transition of the gateway facilities for I4F1, enabling continued, seamless service to customers using the global Inmarsat-4 network. Thus, grant of the STA extension would serve the public interest.

Inmarsat is willing to accept the same conditions as set forth by the Commission in the original STA grant.