

February 13, 2015

System Analysis Branch
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Request for Special Temporary Authority

Pursuant to Section 25.120(a) of the Rules and Regulations (“Regulations”) of the Federal Communications Commission (“Commission”), RigNet Satcom Inc., (“RigNet”), by way of the underlying application submitted by the undersigned, seeks Commission consideration for a Special Temporary Authority (“STA”) to operate an earth station at the Gulf of Mexico location indicated in the application.

Pursuant to Section 25.120(a) of the Regulations, in “circumstances requiring ... temporary use of facilities, request may be made for special temporary authority to install and/or operate new or modified equipment.” In addition, according to Section 25.120(b)(4) of the Regulations, the Commission may grant temporary authorization for a period not to exceed 30 days, if the STA request has not been placed on public notice, and an application for regular authority is not contemplated.

In the instance case, the STA request has not been placed on public notice and RigNet does not plan to file an application for regular authority. The proposed antenna will be used to support a communications system for a temporary oil drilling operation. An STA under these conditions is contemplated by the Regulations due to “circumstances requiring ... temporary use of facilities.” An application for regular authority is not submitted because it would be inefficient for the Commission to process an application for permanent authorization for a project of short duration. Therefore, RigNet respectfully requests an STA for 30 days.

The satellite to be used for this temporary operation will be Intelsat 901 (342 E.L.)

In addition, because of the nature of the project, RigNet believes that the granting of this STA is in the public interest and that delay in the institution of these temporary operations would seriously prejudice the public interest. Once the drilling operation starts in

this remote area, the proposed antenna will be a critical line of communication. In order to insure service, the requested STA date is February 28, 2015. In accordance to Section 25.120(a) of the Regulations, this STA is being filed at least 3 working days prior to the date of proposed operation.

The antenna at issue is a Seatel 9797 C-band (“Antenna”). This Antenna does not strictly comply with Section 25.209 of the Regulations. However, according to Section 25.218 of the Regulations, an applicant may request routine processing of an application if it meets the applicable off-axis EIRP envelopes.

Furthermore, an application pursuant to Section 25.218 must file the corresponding tables outlined in Section 25.115(h) of the Regulations. Applicant presents below the tables outlined in Section 25.115(h) and therefore requests routine processing of this application.

EIRP DENSITY TABLE, AZIMUTH - §25.115 (h) (1)			
Antenna Manufacturer	Seatel	Antenna Diameter	2.4 m
Antenna Model	9797	Antenna Gain Max EIRP Density	41.7 dBi
Transmit Frequency	6.175 GHz		30.7 dBW/4KHz

Off-Axis degrees	§25.218 SD (dBW/4KHz)	Actual SD (dBW/4KHz)	Margin (dB)
1.5	21.9	14.0	-7.9
1.6	21.2	11.5	-9.7
1.7	20.5	9.0	-11.5
1.8	19.9	6.0	-13.9
1.9	19.3	3.0	-16.3
2.0	18.8	0.5	-18.3
2.1	18.2	-2.5	-20.8
2.2	17.7	-6.0	-23.7
2.3	17.3	-7.0	-24.3
2.4	16.8	-6.0	-22.8
2.5	16.4	-4.9	-21.3
2.6	15.9	-3.6	-19.5
2.7	15.5	-3.5	-19.0
2.8	15.1	-3.6	-18.7
2.9	14.7	-4.9	-19.6
3.0	14.4	-7.0	-21.4
3.1	14.0	-9.9	-23.9
3.2	13.7	-13.5	-27.2
3.3	13.3	-15.0	-28.3
3.4	13.0	-11.0	-24.0
3.5	12.7	-7.0	-19.7

Off-Axis degrees	§25.218 SD (dBW/4KHz)	Actual SD (dBW/4KHz)	Margin (dB)
7.5	5.3	-17.1	-22.4
7.6	5.3	-16.0	-21.3
7.7	5.3	-12.1	-17.4
7.8	5.3	-13.5	-18.8
7.9	5.3	-13.0	-18.3
8.0	5.3	-13.0	-18.3
8.1	5.3	-12.0	-17.3
8.2	5.3	-12.0	-17.3
8.3	5.3	-12.0	-17.3
8.4	5.3	-13.5	-18.8
8.5	5.3	-14.0	-19.3
8.6	5.3	-14.5	-19.8
8.7	5.3	-16.0	-21.3
8.8	5.3	-17.1	-22.4
8.9	5.3	-18.0	-23.3
9.0	5.3	-18.5	-23.8
9.1	5.3	-19.0	-24.3
9.2	5.3	-20.0	-25.3
9.3	5.1	-21.0	-26.1
9.4	5.0	-21.5	-26.5
9.5	4.9	-22.5	-27.4

3.6	12.4	-6.0	-18.4
3.7	12.1	-5.2	-17.3
3.8	11.8	-5.0	-16.8
3.9	11.5	-6.0	-17.5
4.0	11.2	-7.0	-18.3
4.1	11.0	-8.5	-19.5
4.2	10.7	-9.9	-20.6
4.3	10.5	-12.1	-22.6
4.4	10.2	-16.0	-26.2
4.5	10.0	-22.1	-32.1
4.6	9.7	-28.0	-37.7
4.7	9.5	-28.0	-37.5
4.8	9.3	-22.1	-31.4
4.9	9.0	-17.1	-26.2
5.0	8.8	-16.0	-24.8
5.1	8.6	-13.5	-22.1
5.2	8.4	-12.0	-20.4
5.3	8.2	-11.0	-19.2
5.4	8.0	-9.9	-17.9
5.5	7.8	-9.0	-16.8
5.6	7.6	-8.5	-16.1
5.7	7.4	-9.0	-16.4
5.8	7.2	-8.5	-15.7
5.9	7.0	-9.9	-16.9
6.0	6.8	-11.0	-17.9
6.1	6.7	-13.0	-19.7
6.2	6.5	-14.0	-20.5
6.3	6.3	-16.0	-22.3
6.4	6.1	-17.0	-23.2
6.5	6.0	-17.0	-23.0
6.6	5.8	-17.0	-22.8
6.7	5.6	-17.0	-22.7
6.8	5.5	-17.0	-22.5
6.9	5.3	-18.0	-23.3
7.0	5.2	-18.5	-23.7
7.1	5.3	-19.5	-24.8
7.2	5.3	-20.0	-25.3
7.3	5.3	-18.3	-23.6
7.4	5.3	-18.5	-23.8

9.6	4.7	-23.0	-27.8
9.7	4.6	-23.5	-28.1
9.8	4.5	-23.5	-28.0
9.9	4.4	-23.0	-27.4
10.0	4.3	-22.0	-26.3
15.0	-0.1	-23.0	-22.9
20.0	-3.2	-27.0	-23.8
25.0	-5.6	-29.0	-23.4
30.0	-7.6	-26.0	-18.4
35.0	-9.3	-28.5	-19.2
40.0	-10.8	-26.0	-15.3
45.0	-12.0	-28.5	-16.5
50.0	-12.7	-29.0	-16.3
55.0	-12.7	-26.0	-13.3
60.0	-12.7	-32.0	-19.3
65.0	-12.7	-34.0	-21.3
70.0	-12.7	-33.5	-20.8
75.0	-12.7	-34.0	-21.3
80.0	-12.7	-33.5	-20.8
85.0	-12.7	-33.0	-20.3
90.0	-12.7	-31.0	-18.3
95.0	-12.7	-32.0	-19.3
100.0	-12.7	-31.0	-18.3
105.0	-12.7	-21.0	-8.3
110.0	-12.7	-23.5	-10.8
115.0	-12.7	-21.0	-8.3
120.0	-12.7	-21.0	-8.3
125.0	-12.7	-21.0	-8.3
130.0	-12.7	-21.0	-8.3
135.0	-12.7	-21.0	-8.3
140.0	-12.7	-22.0	-9.3
145.0	-12.7	-22.0	-9.3
150.0	-12.7	-21.0	-8.3
155.0	-12.7	-23.5	-10.8
160.0	-12.7	-25.0	-12.3
165.0	-12.7	-20.5	-7.8
170.0	-12.7	-23.5	-10.8
175.0	-12.7	-28.5	-15.8
180.0	-12.7	-31.0	-18.3

EIRP DENSITY TABLE, ELEVATION - §25.115 (h) (2)			
Antenna Manufacturer	Seatel	Antenna Diameter	2.4 m
Antenna Model	9797	Antenna Gain	41.7 dBi
Transmit Frequency	6.175 GHz	Max EIRP Density	30.7 dBW/4KHz

Off-Axis degrees	§25.218 SD (dBW/4KHz)	Actual SD (dBW/4KHz)	Margin (dB)
1.5	24.9	19.1	-5.8
1.6	24.2	17.2	-7.0
1.7	23.5	15.2	-8.3
1.8	22.9	13.0	-9.9
1.9	22.3	10.2	-12.1
2.0	21.8	7.4	-14.4
2.1	21.2	3.9	-17.4
2.2	20.7	0.3	-20.4
2.3	20.3	-2.1	-22.3
2.4	19.8	-2.8	-22.5
2.5	19.4	-2.5	-21.9
2.6	18.9	-2.4	-21.3
2.7	18.5	-2.9	-21.4
2.8	18.1	-4.2	-22.3
2.9	17.7	-6.3	-24.0
3.0	17.4	-9.8	-27.2
3.1	17.0	-16.7	-33.7
3.2	16.7	-24.8	-41.5
3.3	16.3	-14.3	-30.7
3.4	16.0	-9.8	-25.8
3.5	15.7	-7.8	-23.5
3.6	15.4	-6.6	-22.0
3.7	15.1	-6.3	-21.4
3.8	14.8	-6.7	-21.5
3.9	14.5	-7.8	-22.3
4.0	14.2	-9.7	-24.0
4.1	14.0	-13.3	-27.3
4.2	13.7	-19.4	-33.1
4.3	13.5	-28.6	-42.1
4.4	13.2	-15.9	-29.1
4.5	13.0	-11.4	-24.3
4.6	12.7	-8.5	-21.3

Off-Axis degrees	§25.218 SD (dBW/4KHz)	Actual SD (dBW/4KHz)	Margin (dB)
6.1	9.7	-10.2	-19.8
6.2	9.5	-9.3	-18.8
6.3	9.3	-9.1	-18.4
6.4	9.1	-9.5	-18.6
6.5	9.0	-10.4	-19.4
6.6	8.8	-12.2	-21.0
6.7	8.6	-14.5	-23.2
6.8	8.5	-18.2	-26.7
6.9	8.3	-21.5	-29.8
7.0	8.2	-18.9	-27.0
7.1	8.0	-15.2	-23.2
7.2	7.9	-12.6	-20.4
7.3	7.7	-10.8	-18.5
7.4	7.6	-9.8	-17.3
7.5	7.4	-9.3	-16.7
7.6	7.3	-9.2	-16.5
7.7	7.1	-9.6	-16.8
7.8	7.0	-10.6	-17.5
7.9	6.9	-11.9	-18.8
8.0	6.7	-14.0	-20.7
8.1	6.6	-16.8	-23.4
8.2	6.5	-19.2	-25.7
8.3	6.3	-19.3	-25.6
8.4	6.2	-16.8	-23.0
8.5	6.1	-14.5	-20.6
8.6	5.9	-12.8	-18.7
8.7	5.8	-11.6	-17.4
8.8	5.7	-10.8	-16.5
8.9	5.6	-10.6	-16.1
9.0	5.4	-10.7	-16.2
9.1	5.3	-11.1	-16.4
9.2	5.2	-11.9	-17.1

4.7	12.5	-6.8	-19.3
4.8	12.3	-5.8	-18.0
4.9	12.0	-5.3	-17.3
5.0	11.8	-5.2	-17.1
5.1	11.6	-5.6	-17.3
5.2	11.4	-6.5	-17.9
5.3	11.2	-7.8	-19.0
5.4	11.0	-10.0	-21.0
5.5	10.8	-13.4	-24.2
5.6	10.6	-19.3	-29.9
5.7	10.4	-36.4	-46.8
5.8	10.2	-20.0	-30.3
5.9	10.0	-14.5	-24.5
6.0	9.8	-11.7	-21.5

9.3	5.1	-12.7	-17.8
9.4	5.0	-13.2	-18.2
9.5	4.9	-13.3	-18.1
9.6	4.7	-12.6	-17.3
9.7	4.6	-11.4	-16.0
9.8	4.5	-10.2	-14.7
9.9	4.4	-9.3	-13.7
10.0	4.3	-8.5	-12.8
15.0	-0.1	-19.2	-19.1
20.0	-3.2	-27.9	-24.7
25.0	-5.6	-28.5	-22.9
30.0	-7.6	-32.9	-25.3
35.0	-9.3	-25.6	-16.3
40.0	-10.8	-27.1	-16.3
45.0	-12.0	-30.5	-18.5

Exhibit A Spectral Density Calculation

PROJECT PARAMETERS:		
Antenna Manufacturer:	SeaTel	9797
Antenna Model:	2.4	m
Transmit:	5.93	GHz
Antenna Gain (Main Beam):	41.70	dBi
Max EIRP Density at Flange:	-12.78	dBW/4KHz
EIRP Density (§25.212(d) Limit):	-2.70	dBW/4KHz

§25.209(a) CONFORMING ANTENNA			ACTUAL ANTENNA		
Angle (Degrees)	§25.209 Gain (dBi)	EIRP Density (dBW/4KHz)	Actual Gain (dBi)	EIRP Density (dBW/4KHz)	EIRP Margin (dBW/4KHz)
1.00	29.00	26.30	36.70	23.92	-2.38
1.10	27.97	25.27	35.70	22.92	-2.35
1.20	27.02	24.32	34.70	21.92	-2.40
1.25	26.58	23.88	34.20	21.42	-2.46
1.30	26.15	23.45	33.70	20.92	-2.54
1.40	25.35	22.65	32.65	19.87	-2.78
1.50	24.60	21.90	31.60	18.82	-3.08
1.60	23.90	21.20	30.55	17.77	-3.43
1.70	23.24	20.54	29.50	16.72	-3.82
1.80	22.62	19.92	26.23	13.45	-6.47
1.90	22.03	19.33	22.97	10.18	-9.15
2.00	21.47	18.77	19.70	6.92	-11.86
2.10	20.94	18.24	18.17	5.38	-12.86
2.20	20.44	17.74	16.63	3.85	-13.89
2.30	19.96	17.26	15.10	2.32	-14.94
2.40	19.49	16.79	14.98	2.19	-14.60
2.50	19.05	16.35	14.85	2.07	-14.29
2.60	18.63	15.93	14.73	1.94	-13.99
2.70	18.22	15.52	14.60	1.82	-13.70
2.80	17.82	15.12	12.63	-0.15	-15.27
2.90	17.44	14.74	10.67	-2.12	-16.86
3.00	17.07	14.37	8.70	-4.08	-18.46
3.33	15.94	13.24	7.70	-5.08	-18.32
3.67	14.88	12.18	10.70	-2.08	-14.27
4.00	13.95	11.25	10.20	-2.58	-13.83
4.33	13.09	10.39	3.70	-9.08	-19.47
4.67	12.27	9.57	7.20	-5.58	-15.15
5.00	11.53	8.83	10.00	-2.78	-11.61
5.33	10.83	8.13	11.40	-1.38	-9.52
5.67	10.16	7.46	9.70	-3.08	-10.54
6.00	8.00	5.30	3.70	-9.08	-14.38
7.00	8.00	5.30	7.70	-5.08	-10.38

**Appendix A (cont.)
Spectral Density Calculation**

PROJECT PARAMETERS:		
Antenna Manufacturer:	SeaTel	9797
Antenna Model:	2.4	m
Transmit:	6.18	GHz
Antenna Gain (Main Beam):	41.70	dBi
Max EIRP Density at Flange:	-12.78	dBW/4KHz
EIRP Density (§25.212(d) Limit):	-2.70	dBW/4KHz

§25.209(a) CONFORMING ANTENNA			ACTUAL ANTENNA		
Angle (Degrees)	§25.209 Gain (dBi)	EIRP Density (dBW/4KHz)	Actual Gain (dBi)	EIRP Density (dBW/4KHz)	EIRP Margin (dBW/4KHz)
1.00	29.00	26.30	38.00	25.22	-1.08
1.10	27.97	25.27	36.90	24.12	-1.15
1.20	27.02	24.32	35.80	23.02	-1.30
1.25	26.58	23.88	35.25	22.47	-1.41
1.30	26.15	23.45	34.70	21.92	-1.54
1.40	25.35	22.65	33.45	20.67	-1.98
1.50	24.60	21.90	32.20	19.42	-2.48
1.60	23.90	21.20	30.95	18.17	-3.03
1.70	23.24	20.54	29.70	16.92	-3.62
1.80	22.62	19.92	26.97	14.19	-5.73
1.90	22.03	19.33	24.23	11.45	-7.89
2.00	21.47	18.77	21.50	8.72	-10.06
2.10	20.94	18.24	20.37	7.59	-10.66
2.20	20.44	17.74	19.23	6.45	-11.29
2.30	19.96	17.26	18.10	5.32	-11.94
2.40	19.49	16.79	17.87	5.09	-11.71
2.50	19.05	16.35	17.65	4.87	-11.49
2.60	18.63	15.93	17.42	4.64	-11.29
2.70	18.22	15.52	17.20	4.42	-11.10
2.80	17.82	15.12	16.73	3.95	-11.18
2.90	17.44	14.74	16.27	3.49	-11.25
3.00	17.07	14.37	15.80	3.02	-11.36
3.33	15.94	13.24	14.70	1.92	-11.32
3.67	14.88	12.18	13.20	0.42	-11.77
4.00	13.95	11.25	12.10	-0.68	-11.93
4.33	13.09	10.39	11.10	-1.68	-12.07
4.67	12.27	9.57	10.20	-2.58	-12.15
5.00	11.53	8.83	9.40	-3.38	-12.21
5.33	10.83	8.13	8.70	-4.08	-12.22
5.67	10.16	7.46	8.30	-4.48	-11.94
6.00	8.00	5.30	7.70	-5.08	-10.38
7.00	8.00	5.30	5.00	-7.78	-13.08

**Appendix A (cont.)
Spectral Density Calculation**

PROJECT PARAMETERS:		
Antenna Manufacturer:	SeaTel	9797
Antenna Model:	2.4	m
Transmit:	6.43	GHz
Antenna Gain (Main Beam):	41.70	dBi
Max EIRP Density at Flange:	-12.78	dBW/4KHz
EIRP Density (§25.212(d) Limit):	-2.70	dBW/4KHz

§25.209(a) CONFORMING ANTENNA			ACTUAL ANTENNA		
Angle (Degrees)	§25.209 Gain (dBi)	EIRP Density (dBW/4KHz)	Actual Gain (dBi)	EIRP Density (dBW/4KHz)	EIRP Margin (dBW/4KHz)
1.00	29.00	26.30	37.50	24.72	-1.58
1.10	27.97	25.27	36.23	23.45	-1.82
1.20	27.02	24.32	34.97	22.19	-2.13
1.25	26.58	23.88	34.33	21.55	-2.33
1.30	26.15	23.45	33.70	20.92	-2.54
1.40	25.35	22.65	32.20	19.42	-3.23
1.50	24.60	21.90	30.70	17.92	-3.98
1.60	23.90	21.20	29.20	16.42	-4.78
1.70	23.24	20.54	27.70	14.92	-5.62
1.80	22.62	19.92	25.03	12.25	-7.67
1.90	22.03	19.33	22.37	9.59	-9.75
2.00	21.47	18.77	19.70	6.92	-11.86
2.10	20.94	18.24	18.97	6.19	-12.06
2.20	20.44	17.74	18.23	5.45	-12.29
2.30	19.96	17.26	17.50	4.72	-12.54
2.40	19.49	16.79	16.55	3.77	-13.03
2.50	19.05	16.35	15.60	2.82	-13.54
2.60	18.63	15.93	14.65	1.87	-14.06
2.70	18.22	15.52	13.70	0.92	-14.60
2.80	17.82	15.12	10.37	-2.41	-17.54
2.90	17.44	14.74	7.03	-5.75	-20.49
3.00	17.07	14.37	3.70	-9.08	-23.46
3.33	15.94	13.24	7.70	-5.08	-18.32
3.67	14.88	12.18	9.20	-3.58	-15.77
4.00	13.95	11.25	6.70	-6.08	-17.33
4.33	13.09	10.39	7.70	-5.08	-15.47
4.67	12.27	9.57	9.10	-3.68	-13.25
5.00	11.53	8.83	6.70	-6.08	-14.91
5.33	10.83	8.13	-2.30	-15.08	-23.22
5.67	10.16	7.46	1.70	-11.08	-18.54
6.00	8.00	5.30	4.00	-8.78	-14.08
7.00	8.00	5.30	-1.30	-14.08	-19.38