

## Exhibit A

### DESCRIPTION OF STA REQUEST AND PETITION FOR WAIVER OF SECTIONS 25.137 AND 25.114

#### I. DESCRIPTION OF STA REQUEST

Inmarsat Mobile Networks, Inc. (“Inmarsat Mobile Networks”) hereby requests special temporary authority (“STA”) to use its 19 meter earth station antenna located in Paumalu, Hawaii and operated pursuant to Call Sign KA25 (the “19m Antenna”) to permit C-band telemetry, tracking, and control (“TTAC”) communications with the Inmarsat-5 F3 spacecraft during its Launch and Early Orbit Phases (LEOP), electric orbit raising and In-Orbit Testing.<sup>1</sup> Operations of the 19m Antenna during this LEOP period would be within the envelope of the technical parameters of the existing license for KA25, and would require only the addition of Inmarsat-5 F3 as a point of communication for the 19m Antenna.

The Inmarsat-5 F3 satellite will be launched by a Proton launch vehicle from the Baikonur facility in Kazakhstan. Inmarsat Mobile Networks and its affiliates will provide a network of ground stations around the globe that will provide communication with the spacecraft during the LEOP. The Inmarsat Mobile Networks facility at Paumalu, Hawaii will form part of the Inmarsat Mobile Networks ground station network for this launch support using the 19m Antenna. Launch is currently scheduled for May 15, 2015.

Inmarsat Mobile Networks will be responsible for the technical aspects of the launch support, using the C-band portion of the satellite prior to its commercial operation. The mission control center will be located at the Boeing Satellite Company premises in Los Angeles, USA, and all the mission operations will be conducted by Boeing under the direction of Inmarsat Global. It is expected that the Paumalu 19m Antenna will be used intermittently during the first few days of support (typically 8 to 12 days) for limited periods when the spacecraft is visible from the Paumalu station, and subsequently for a continuous period of about 9 to 10 weeks throughout electric orbit raising and the In-Orbit Test (IOT) phase.

Following the LEOP phase and before entering commercial service, Inmarsat-5 F3 will undergo a 5 to 6 weeks electrical propulsion orbit raising phase followed by a one month IOT phase both at (or close to) the geostationary location of 180° E.L. At the end of the IOT, the satellite will commence operational service at 180° E.L. Once Inmarsat-5 F3 enters operational service nominal on-station TTAC operations will be conducted in Ka-band from New Zealand.

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<sup>1</sup>The Inmarsat-5 F3 satellite is a Boeing 702 Ka-band satellite (with dual-band C-band and Ka-band TTAC transponder) which will be operated from the 180° E.L. orbital location.

## **II. TO THE EXTENT THEY APPLY, GOOD CAUSE EXISTS FOR AWAIVER OF CERTAIN PORTIONS OF SECTIONS 25.137 AND 25.114**

Inmarsat Mobile Networks is providing the following legal and technical information to support this STA request and certain waiver requests that are necessary in order to communicate from the 19m Antenna to the Inmarsat-5 F3 spacecraft.

Pursuant to Section 25.137 of the Federal Communications Commission's ("Commission" or "FCC") rules, the same technical information required by Section 25.114 for U.S.-licensed space stations, and certain legal information, must be submitted by earth station applicants "requesting authority to operate with a non-U.S. licensed space station to serve the United States..."<sup>2</sup> Inmarsat Mobile Networks seeks authority to support the needed TTAC during the LEOP of the Inmarsat-5 F3 spacecraft from shortly after launch to low earth and transfer orbits and IOT. Inmarsat Mobile Networks does not request authority to provide commercial service to the United States, and thus believes that Section 25.137 does not apply.

To the extent the Commission determines, however, that Inmarsat Mobile Networks's request for authority to provide LEOP on a special temporary basis is a request to serve the United States with a non-U.S.-licensed satellite, Inmarsat Mobile Networks respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission's rules, to the extent that Inmarsat Mobile Networks has not herein provided the information required by these rules.<sup>3</sup> The Commission may grant a waiver for good cause shown.<sup>4</sup> A waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause for a waiver of portions of Section 25.114 exists. Inmarsat Mobile Networks seeks authority only to conduct LEOP support for Inmarsat-5 F3. Thus, any information sought by Section 25.114 that is not relevant to the LEOP – e.g., antenna patterns, energy and propulsion and orbital debris.

As evidenced by Inmarsat Mobile Networks's license for the 19m Antenna, Inmarsat Mobile Networks has the requisite authority to perform the LEOP of the Inmarsat-5 F3 satellite, except for the point of communication. Moreover, as with any STA, Inmarsat Mobile Networks will conduct the operations on an unprotected, non-interference basis.

Because it is not relevant to the service for which Inmarsat Mobile Networks seeks authorization, Inmarsat Mobile Networks seeks a waiver of all the technical and legal information required by Section 25.114, to the extent it is not provided herein. As noted above, Inmarsat Mobile Networks has provided the required information to the extent that it is relevant to the LEOP service for which Inmarsat Mobile Networks seeks authorization.

Good cause also exists to waive portions of Section 25.137, to the extent the information required is not herein provided. Section 25.137 is designed to ensure that "U.S.-licensed satellite systems have effective competitive opportunities to provide analogous

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<sup>2</sup> 47 C.F.R. § 25.137(a).

<sup>3</sup> 47 C.F.R. §§25.137 and 25.114.

<sup>4</sup> 47 C.F.R. §1.3.

services” in other countries. Here, there is no service being provided by the satellite; Inmarsat Mobile Networks is simply providing TTAC facilities while the satellite is in transfer orbit on the way to its final geostationary orbital location and during IOT. Thus, the purpose of the information required by Section 25.137 is not implicated here. For example, Section 25.137(d) requires earth station applicants requesting authority to operate with a non-U.S.-licensed space station that is not in orbit and operating to post a bond.<sup>5</sup> The underlying purpose in having to post a bond – i.e., to prevent warehousing of orbital locations by operators seeking to serve the United States – would not be served by requiring Inmarsat Mobile Networks to post a bond in order to conduct a limited period of LEOP support of the Inmarsat-5 F3 satellite.

Inmarsat-5 F3 is licensed by the UK Space Agency of the United Kingdom. Inmarsat-5 F3 is a commercial communications satellite primarily supporting broadband data services to mobile users in the Pacific Ocean Region. The spacecraft is meant to serve the United States. Thus, the purpose of Section 25.137 – to ensure that U.S. satellite operators enjoy “effective competitive opportunities” to serve foreign markets and to prevent warehousing of orbital locations serving the United States – will not be undermined by grant of this waiver request.

Finally, Inmarsat Mobile Networks notes that it expects to communicate with the Inmarsat-5 F3 satellite using the 19m Antenna pursuant to this STA for a maximum period of 3 months under nominal launch conditions. Requiring Inmarsat Mobile Networks to provide technical and legal information, where there is no risk of interference and the operation is expected to cease within 3 months, is unnecessary and would pose undue hardship without serving underlying policy objectives. Given these particular facts, Inmarsat Mobile Networks believes that the waiver sought herein is appropriate.

## **MISSION TECHNICAL PARAMETERS**

### **Earth Station**

Inmarsat Mobile Networks provides the following technical parameters for information only. The operations contemplated in this request fall within the existing license parameters for the 19m Antenna.

#### **EARTH-to-SPACE:**

Transmit Frequencies: 5926.5 MHz and 6422.5 MHz

Transmit Polarisation: Linear Horizontal and Circular RH

Maximum EIRP: 89 dBW

RF Modulation: FM

Minimum Elevation for Transmission: 10 degrees

#### **SPACE-to-EARTH:**

Receive Frequencies: 4199.0 MHz and 4199.5 MHz

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<sup>5</sup> 47 C.F.R. §25.137(d)(4).

Receive Polarisation: Linear Vertical and Circular LH  
Maximum Spacecraft EIRP: 6 dBW within +/- 70 degrees  
RF Modulation: PM

Azimuth Range: 360 degrees

Duration of Communications: three months from launch.

### **Space Station Coordination**

The coordination of communications for the support of the launch of the Inmarsat-5 F3 spacecraft with existing spacecraft operators during LEOP and other operations is the responsibility of Inmarsat. Inmarsat has undertaken coordination of communications for the support of the launch of Inmarsat-5 F3 with other spacecraft operators that may be potentially affected during LEOP, electric orbit raising and IOT operations.

All the preparatory activities and contacts for such coordination have been made and all issues have been satisfactorily resolved. Inmarsat also has undertaken to review the need for coordination based on any changed circumstances that may occur. In accordance with normal industry practices, communications with other operators will be kept open in the period leading to and throughout the LEOP activities, to ensure that the LEOP will be conducted on a non-interference basis.

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Grant of the requested STA will serve the public interest, convenience and necessity because it will enable Inmarsat Mobile Networks to provide essential TTAC functions to the Inmarsat-5 F3 spacecraft, within technical parameters consistent with the licensed parameters of the 19m Antenna, without creating any risk of harmful interference. Inmarsat Mobile Networks respectfully requests that the Commission grant STA beginning May 27, 2015 for a period of 90 days.