

## EXHIBIT A

### DESCRIPTION OF PROPOSED SPECIAL TEMPORARY OPERATIONS

Pursuant to Section 25.120 of the Commission's rules,<sup>1</sup> Omnitrac, LLC ("Omnitrac") requests a special temporary authorization ("STA") for a 60-day period to permit flexibility to operate mobile earth stations authorized in the 11.7-12.2 GHz (downlink) and 14.0-14.5 GHz (uplink) frequency bands ("Ku band") under an existing license (Call Sign E960474 or "Boatrac license"), consistent with technical parameters specified under either the existing Boatrac license or the license modification application concurrently filed herewith ("Modification Application").

*Proposed Boatrac License Modifications.* In its Modification Application, Omnitrac requested the following license modifications:

- (1) the addition of a new remote control/hub station to the remote control/hub stations specified in the existing Boatrac license—*i.e.*, Canadian-licensed remote control/hub station (Call Sign CZ294) at 2055 Flavelle Boulevard, Mississauga, Ontario, Canada L5K 1Z8, Telephone: (905) 403-2114; and
- (2) the modification of the specific operating frequencies listed on the existing Boatrac license to include 14018.712-14033.288 MHz and 14090.085-14100.085 MHz for uplinks (transmit mode) (in addition to the currently licensed 14200.000-14450.000 MHz) and 12066.375-12069.375 MHz, 11957.500-11960.500 MHz, and 11710.500-11713.500 MHz for downlinks (receive mode) (all of which are included within the currently licensed 11700.000-12200.000 MHz band for downlinks).

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<sup>1</sup> 47 C.F.R. § 25.120.

Omnitracs further stated that all other technical parameters specified under the existing Boatracs license will remain the same. This STA application requests authority for Omnitracs to begin operation of the Boatracs MESs pursuant to the technical parameters set forth in the Modification Application to facilitate the transition of the Boatracs customers from Omnitracs to Shaw Satellite Services Inc. (“Shaw”) as set forth below.

*Transition of Boatracs Customers from Omnitracs to Shaw.* On or about May 31, 2015, Omnitracs plans to discontinue service to the end-user customers served by the Boatracs license. Upon the service discontinuance, the customers will be migrated to Shaw, the proposed assignee of the Boatracs license pursuant to a separate license assignment application that the Commission recently placed on public notice (“Assignment Application”).<sup>2</sup> The Modification Application is intended to facilitate Shaw’s ability to serve the Boatracs customers following consummation of the license assignment and the migration of the customers to Shaw’s network, as well as to prevent any customer disruption during the transition of the Boatracs MESs from Omnitracs’ network to Shaw’s network. For a variety of technical reasons, the Boatracs customers cannot be transitioned from Omnitracs’ network to Shaw’s network pursuant to a flash cut, but instead must be transitioned on a rolling basis over a period of time to ensure the maximum effective successful MES transition. Specifically, existing MESs authorized under the Boatracs license will be retuned on a rolling basis to communicate with Shaw’s Canadian-licensed remote control/hub station and to operate on the same frequencies authorized under Shaw’s existing Canadian license to operate similar Ku-band MESs throughout Canada. The parties do not anticipate the replacement of any MESs as part of this process.

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<sup>2</sup> See *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Public Notice, Rpt. N. SES-01734 (Mar. 25, 2015) (accepting assignment application filing, File No. SES-ASG-20150313-00147).

Up to 75 percent of the existing Boatracs MESs are expected to be retuned and transitioned within an initial three-day period. Maximizing the transition of the remaining 25 percent of the Boatracs MESs, however, will require up to several weeks of additional time because some MESs could, for example, be temporarily turned off. Therefore, an STA is required to permit a limited transition period during which most of the Boatracs MESs are expected to operate under the proposed technical modifications within a few days of receiving a software upgrade in the normal course, while other devices will be required to operate under the existing authorized technical parameters until their transition can be completed. Thus, Omnitrac is filing this STA application to enable Omnitrac to commence the transition of the Boatracs customers as soon as reasonably possible and to enable Omnitrac to complete the transition prior to May 31, 2015 without disruption to the operations of the Boatracs customers.

During the transition period (*i.e.*, from Commission action on this STA application until consummation of the proposed license assignment), Omnitrac will provide service to the Boatracs customers using a combination of Omnitrac's network and Shaw's network. To the extent that Omnitrac provides service to initially transitioned Boatracs customers using Shaw's network facilities during the transition period covered by the proposed STA, Omnitrac will do so pursuant to an arrangement with Shaw and under Omnitrac's ultimate supervision and oversight. Throughout the transition period, all Boatracs customers will be provided service via U.S.-licensed and non-U.S.-licensed satellites specified on the FCC's Permitted Space Station List, including the Anik F2 and Galaxy 25 (formerly Telstar 5) satellites. No later than May 31, 2015, the transition will be deemed complete, the Boatracs license and Boatracs customers will be assigned to Shaw (assuming that the Assignment Application previously has been granted by the Commission), and Omnitrac will discontinue service.

Contact information for OmnitracS can be found in the FCC Form 312 associated with this Exhibit. In addition, pursuant to the Commission's request, a U.S. point of contact will be made available 24 hours a day, 7 days a week, for inquiries regarding the Boatracs MESs that are being operated by OmnitracS during the transition period under an arrangement with Shaw and using Shaw's remote control/ hub station and associated frequencies, as follows:

Joe Guerriero  
Senior Vice President & General Counsel  
ViaWest (an affiliate of Shaw)  
Phone: (720) 891-2524  
joe.guerriero@viawest.com

*Public Interest Statement.* Commission grant of this STA application will serve the public interest by ensuring continuity of service to the Boatracs customers, facilitating the orderly transition of services without disruption to Shaw's Canadian-licensed remote control/hub station and associated frequencies, and enabling the provision of harmonized subscriber equipment throughout the United States and Canada, thus resulting in economies of scale.