

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Introduction

Pursuant to Section 25.120 of the Commission's rules, Telesat Network Services, Inc. ("Telesat") hereby requests Special Temporary Authority ("STA"), beginning on or before September 30, 2015, to operate two earth station hubs, licensed under Call Signs KA399 and E060351, in the manner described herein for a period of 60 days. Telesat has just submitted applications to modify both licenses,¹ which modifications it submitted based on recent developments. Telesat seeks authority in this STA request to implement on an interim basis the changes proposed in its modification application.

In particular, Telesat has an urgent need for authority to communicate with the MSAT-1 satellite as point of communication both while it drifts to and when it is stationed at its newly-authorized location of 107.5° W.L. For reasons stated below, Telesat's STA request is support by good cause.

Discussion

Telesat provides telemetry, tracking, and command ("TT&C") for LightSquared's MSAT-1 satellite, which currently is stationed at 106.5° W.L. The

¹ FCC File Nos. SES-MFS-20150922-00604 (KA399) and SES-MFS-20150922-00603 (E060351).

above-referenced earth station facilities are those assigned to primary and back-up TT&C duty for MSAT-1.

Industry Canada has authorized SkyTerra (Canada) Inc., LightSquared's Canadian subsidiary and the licensee in Canada of MSAT-1, to relocate the satellite from the 106.5° W.L. orbital position to the 107.5° W.L. orbital position, where it is expected to operate until its end of life. After Industry Canada authorized this relocation, LightSquared submitted applications, which the Commission recently granted, to modify its earth station licenses to update the orbital location of the MSAT-1 satellite.

As noted above, Telesat has likewise submitted earth station modification applications seeking authority to communicate with MSAT-1 at its new orbital location. However, Telesat was only recently notified as to when the MSAT-1 relocation would commence, and Telesat's modification applications will not be granted in time for the relocation. Telesat therefore is requesting Special Temporary Authority to enable it to maintain control of MSAT-1 while Telesat's modification applications are pending.²

² Telesat notes that 25.118(a)(5) of the Commission's rules, which permits certain earth station modifications involving relocated space stations to be made on a notification basis, is inapplicable. Section 25.118(a)(5) notifications may be made only in connection with space station relocations made pursuant to Section 25.118(e) of the rules. The relocation of MSAT-1 is not being made pursuant to Section 25.118(e).

Telesat respectfully requests STA commencing on or before September 30. Facilitating continued control of a satellite is unquestionably in the public interest.

Conclusion

Accordingly, and for good cause shown, Telesat respectfully requests that it be granted the STA described above^[j1].