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March 14, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Harris CapRock Communications, Inc. – Section 1.65 Submission, Clarification of STA Requests; File Nos. SES-STA-20160224-00170 and SES-STA-20160224-00171 (Call Sign E060157)

Dear Ms. Dortch:

Harris CapRock Communications, Inc. ("Harris CapRock"), in connection with the above-referenced requests for special temporary authorization ("STA") and pursuant to Section 1.65 of the Commission's Rules, 47 C.F.R. § 1.65, hereby clarifies certain elements of the requests.

In the STA requests, Harris CapRock sought authority for 60 and 180 days to operate the ST5000-2.4 terminal, its new multi-band earth station onboard vessel ("ESV"), with the O3b Ka-band NGSO system. Harris CapRock stated that it sought authority to operate consistent with the terms and conditions imposed on O3b's own Ka-band maritime terminals, which are very similar to those proposed by Harris CapRock.[1] Thus, the STA requests contemplate the same frequencies, geographic scope and general conditions as applicable to O3b maritime operations.[2]

Although Harris CapRock provided technical and operational information with the STA requests similar to that required by the Commission's ESV rules for other frequency bands, it did not include a map of the proposed service area. In addition, Harris CapRock identified a minimum elevation angle of 5° for all proposed frequencies in the draft Form 312 accompanying the STA requests, even though a minimum elevation angle of 10° is applicable to O3b operations in certain frequency bands. Harris CapRock clarifies both of these issues as follows.

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[1] *See, e.g.,* 180-Day STA Request, Narrative, at 2, 3.

[2] Harris CapRock notes, however, that different operational conditions (e.g., minimum elevation angle and southern-most latitude) apply depending on the band in which an O3b maritime terminal operates. *Compare* O3b Limited, Call Sign E130098, File No. SES-MOD-20140814-00655 (granted Jan. 22, 2015) *with* Letter from Jose Albuquerque, Chief, Satellite Division and Mark Settle, Chief, Policy and Rules Division, to Suzanne Malloy, O3b Limited, DA 16-99, File No. SES-MSC-20151021-00760 (rel. January 29, 2016). For these STA requests, Harris CapRock will accept the most restrictive of these conditions in all bands.

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- *Service area of the proposed operations* – Harris CapRock proposes to operate the ST5000-2.4 terminal throughout the Gulf of Mexico, in the Caribbean above 13° N latitude, in cruise ports in South Florida and U.S. Caribbean territories, and in other ocean regions distant from the U.S. coastline so that there is no potential for interference to FCC-licensed terrestrial operations. (See attached service area map.) Harris CapRock intends to broaden the proposed service area in a future license modification application.

- *Minimum elevation angle* – The O3b maritime terminal is authorized to operate at a 5° minimum elevation angle in the 18.8-19.3 GHz and 28.6-29.1 GHz bands, and a 10° minimum elevation angle in the17.8-18.6 GHz and 27.6-28.4 GHz bands. Harris CapRock accepts a 10° minimum elevation angle for the ST5000-2.4 in these STA requests in all frequency bands.

Thank you very much for your consideration of this matter. Please do not hesitate to contact me with any questions.

Respectfully submitted,

Carlos M. Nalda
Principal
LMI Advisors

Attachment
cc w/ att.: Paul Blais
Trang Nguyen