

Orbital Media Networks believes granting this Special Temporary Authority is in the public's best interest because of the peculiar situation arising from the mass migration of commercial radio networks from distribution over AMC8 (139 degrees West) to AMC18 (105 degrees West) due to the age and failing health of AMC8.

- 1) Most commercial radio stations take syndicated programming from one or more of the major syndicators moving from AMC8 to AMC18. This migration begins February 1st.
- 2) Since most commercial radio stations have only one C-Band receive earth station, usually shared between multiple radio stations at their studio / office location, and since the vast majority of stations that do use syndicated programming also take programs from more than one of the major syndicators, it is important that all of the syndicators a) become available at the same time on AMC18, and b) provide programming on both satellites for some period of time (the "dual illumination period") so there is plenty of time for stations to repoint, repair, or replace their antennas.
- 3) Orbital Media Networks operates two receiver platforms to serve affiliates of Orbital Media Networks programming and programming that we distribute for third party syndicators. We made arrangements for our satellite fleet operator, SES, to provide dual-illumination services at one of their earth stations, receiving our two carriers, which we transmit to the new satellite from our Englewood, CO earth station, decoding them to ASI streams, and re-modulating, upconverting, and transmitting them to the other satellite.
- 4) Unfortunately our older receiver platform is not fully DVB compliant and SES has been unable to successfully dual-illuminate a carrier for that platform, a problem which would leave hundreds of stations without the syndicated programming they count on, if left unsolved.

The STA we seek will allow us to dual-illuminate our older Starguide carrier locally in Englewood, transmitting them using the 3.7m Suman antenna that was previously licensed at our site, thereby eliminating an excessive burden on the radio stations depending on that platform. As we have indicated elsewhere, Micronet is currently performing the required coordination study and preparing the engineering exhibits necessary to show compliance with FCC rules and / or justify an appropriate waiver to make re-licensing the 3.7m antenna in question practical. Our proposed operation falls within the off-axis emissions envelope of the 6.1m antenna already on our E010074 license.