

REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

Orbital Media Networks, Inc. ("OMNi"), pursuant to Section 25.120 of the Commission's rules, hereby requests extension of Special Temporary Authority ("STA") to continue to operate a fixed 3.7-m antenna at its Englewood, CO facility in the manner described herein. OMNi respectfully requests that its STA, SES-STA-20170223-00196 incorporated by reference herein, be extended by one hundred twenty (120) days beginning 4/5/2017 - immediately after the original expiration date of April 4, 2017, consistent with 47 C.F.R. 25.120(b)(2) of the Commission's rules.

OMNi has filed for modification of our existing license (Call Sign E010074) to add the subject antenna to the same license. OMNi anticipates that it will require a period exceeding the term of the previously granted STA for the Commission to act on the license modification application SES-MOD-INTR2017-00877.

Continued operations will comply with the technical specifications set forth in the existing STA.

Grant of this STA extension will serve the public interest, convenience, and necessity 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).

- 1) Most commercial radio stations take syndicated programming from one or more of the major syndicators moving from AMC8 to AMC18. This migration began February 7th and is expected to end no later than August 31st, 2017.
- 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 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 to extend allows us to continue to dual-illuminate our older Starguide carrier locally in Englewood, CO transmitting using the 3.7m Suman antenna that was previously licensed at our site, and is currently being operated under STA (SES-STA-20170223-00196), thereby eliminating an excessive burden on the radio stations depending on that platform for programming. The required coordination study (performed by Micronet) was clear and the engineering exhibits necessary to show compliance with FCC rules and / or justify an appropriate waiver for re-licensing the 3.7m antenna in question have been filed under SES-MOD-INTR2017-00877. Our proposed operation falls within the off-axis emissions envelope of the 6.1m antenna already authorized at the same site on our existing Earth Station (Call Sign E010074) license.

Respectfully submitted,



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