

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Application of RigNet SatCom, Inc. for a)	
60-Day Special Temporary Authorization)	Call Sign: E980235
("STA") to Operate Earth Station Onboard)	
Vessel ("ESV") Terminals in the Ku-band)	File No:

APPLICATION FOR SPECIAL TEMPORARY AUTHORIZATION

RigNet SatCom, Inc. ("RigNet"), pursuant to Section 25.120 of the Commission's rules, 47 C.F.R. § 25.120, seeks a 60-day special temporary authorization ("STA") to operate two (2) earth station onboard vessel ("ESV") terminal types¹ in the 11.7-12.2 GHz band (space-to-Earth) and the 14.0-14.5 GHz band (Earth-to-space) (the "Ku-band") to support essential maritime operations in U.S. and international waters. The requested STA will allow RigNet to initiate equipment integration and handover of earth station facilities from Data Technology Solutions LLC ("DTS") to RigNet following RigNet's acquisition of DTS, ensuring no lapse in vital satellite-based voice and data services.

RigNet seeks this STA to permit short term operations of the Sea Tel terminals in the Ku-band during the pendency of its concurrently filed ESV blanket license modification application for the identical operations sought herein.² RigNet seeks an STA for a period of 60 days commencing on August 30, 2017, or as soon as practicable thereafter, to ensure the continued delivery of critical maritime satellite communication services.

¹ Up to 250 units each of the 0.60m Sea Tel Model USAT-24 and 0.75m Sea Tel Model USAT-30 ESV terminals (the "Sea Tel terminals").

² See RigNet SatCom, Inc., File No. , Call Sign E980235 (filed on _____)

I. Discussion

RigNet is the wholly owned, FCC license holding subsidiary of RigNet Inc., a publicly traded company that recently acquired the assets of DTS via a commercial purchase agreement.³ DTS is a Louisiana-based company that provides communications and IT services to the offshore and maritime industries, as well as disaster relief solutions. Rather than assign the existing DTS license⁴ to RigNet, RigNet has filed the underlying modification application to add certain earth station facilities in the DTS license to its own ESV blanket license, Call Sign E980235.⁵

The assignment of the DTS license to RigNet would result in duplicative licensed earth stations and include gateway facilities no longer in use. RigNet only requires the addition of the two (2) subject Sea Tel terminals, the remaining authorized equipment and facilities in the DTS license is otherwise redundant or unnecessary. This approach will ease the administrative burden for the Commission and will allow RigNet to consolidate these new operations under its existing authorization. RigNet will not operate the Sea Tel terminals until this STA request is granted and it is conferred appropriate operating authority.

The Sea Tel terminals will be used by RigNet to provide a wide array of broadband satellite communications services to marine barges and vessels in motion in U.S. and international waters. The ESVs will be used in concert with licensed hub earth stations located throughout United

³ See GlobeNewswire, *RigNet Announces Strategic Asset Acquisition of Data Technology Solutions (DTS)*, (24 July 2017), <https://globenewswire.com/news-release/2017/07/24/1056152/0/en/RigNet-Announces-Strategic-Asset-Acquisition-of-Data-Technology-Solutions-DTS.html>.

⁴ See Data Technology Solutions, LLC, File No. SES-MOD-20150227-00103, Call Sign E100084 (“DTS license”).

⁵ RigNet SatCom Inc. File No. SES-MOD-20150611-00354, Call Sign E980235.

States⁶ and will only communicate with U.S.-licensed satellites and non-U.S.-licensed satellites on the Commission's Permitted Space Station List pursuant to Section 25.222(b)(7) of the Commission's rules. The Sea Tel terminals are well known to the Commission, have been previously licensed for similar maritime operations and are eligible for routine processing under the Commission's rules.⁷

The Sea Tel terminals are designed to meet the Commission's ESV requirements set forth in Section 25.222 of the Commission's rules, including: (i) maintaining off-axis EIRP within the levels codified in the applicable FCC mask; (ii) maintaining a pointing accuracy of 0.2 or better; (iii) automatic cessation of emissions within 100 ms if pointing offset exceed 0.5; and (iv) not resuming transmissions until pointing accuracy is within 0.2. In addition to these fundamental operational characteristics, RigNet will operate the Sea Tel terminals in accordance with the geographic limitations and coordination provisions in the Commission's rules designed to protect other users of spectrum.⁸

The attached as-filed FCC Form 312 Schedule B and Technical Appendix contain the relevant information relating the technical parameters of the proposed ESV operations, including radiation hazard studies and a declaration of conformity for the Sea Tel terminals.⁹

⁶ The ESV terminals may communicate with certain hub earth stations licensed under Call Signs: E060388, E000275, E990541, E920698 and E020191.

⁷ See, e.g., Data Technology Solutions LLC, File No. SES-MOD-20150227-00103, Call Sign E100084.

⁸ See generally 47 C.F.R. § 25.222(c) & 25.222(d).

⁹ RigNet notes that, although the FCC declaration of conformity cites the 2009 version of the Commission's rules, the relevant EIRP spectral density limits and operational requirements have been relaxed (i.e., made less restrictive with flattening/removal of the "wings" from the off-axis ESD masks). Thus, compliance with the more restrictive, prior version of rules is necessarily compliant with the current less-restrictive rules and sufficient to support this request. In

II. STA Request & Public Interest Statement

RigNet respectfully requests this 60-day STA pursuant to Section 25.120 of the Commission's Rules, 47 C.F.R. § 25.120. Section 25.120(a) provides that STA requests should be filed at least three working days prior to the date of commencement of the proposed operations. Here, RigNet is proposing to commence operations on August 30, 2017. Additionally, the Commission may grant a 60-day STA if the request has not been placed on public notice and the applicant plans to file a request for regular authority for the service. RigNet has filed a modification application for long-term authority to operate the Sea Tel terminals under its ESV blanket license authorization, Call Sign E980235, and further acknowledges that any action on the requested STA will not affect the Commission's ultimate determination with respect to the pending modification application.

Grant of this application will serve the public interest by allowing RigNet to continue to provide vital connectivity services to users in the maritime and energy industries and ensure to lapse in service to critical operational communications throughout U.S. and international waters. The immediate integration of DTS facilities into RigNet's network is an essential step to ensure short-term provisioning of services during the pendency of the modification application. The STA will also support the near-term improvement of RigNet's connectivity solutions, improving its operational flexibility and allowing it to better serve users, including marine barges, mobile oil and gas support vessels and other in-motion maritime operations, that may be unable to obtain communications services through alternative facilities.

addition, because the antennas' performance characteristics have not changed, the material accurately represents RigNet's ESV proposed operations. RigNet has also confirmed with the manufacturer that the attached declaration of conformity is the current and only version available.

III. Conclusion

Based on the foregoing, grant of this STA will serve the public interest and is otherwise consistent with Commission policy. RigNet respectfully requests that the Commission grant its request to for a 60-day STA to operate the Sea Tel terminals commencing on August 30, 2017, or as soon as practicable thereafter.