

E960131 SES-STA-20180119-00046 IB2018000183
Iridium Satellite LLC

Approved by OMB
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Extension of LEOP STA E960131 Tempe 1/18

1. Applicant

Name: Iridium Satellite LLC **Phone Number:** 703-287-7518
DBA Name: **Fax Number:**
Street: 1750 Tysons Boulevard **E-Mail:** maureen.mclaughlin@iridium.com
Suite 1400
City: McLean **State:** VA
Country: USA **Zipcode:** 22102
Attention: Ms Maureen C McLaughlin




File # SFS-STA-20180119-00046
Call Sign E960131 Grant Date 5-1-18
(or other identifier)
Term Dates From: 5-1-18 To: 10-28-18
Approved: Maureen C McLaughlin

Iridium Satellite LLC-
Call Sign E960131
File Number SES-STA-20180119-00046
Special Temporary Authority

Iridium Satellite LLC is granted Special Temporary Authority for 180 days starting May 01, 2018, to provide LEOP service to the Iridium NEXT NGSO satellites and to operate at a U.S. licensed authorize gateway earth station located in Tempe, AZ in the 29.1-29.3 GHz (Earth- to-space) and the 19.4-19.6 GHz (space-to-Earth) frequency bands under the following conditions:

1. Operations will not exceed the operational power levels and parameters requested and coordinated.
2. Operations, shall not cause harmful interference to, and shall not claim protection from interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference and notify the FCC in writing.
3. Transmitter(s) must be turned off during antenna maintenance to ensure compliance with the FCC-specified safety guidelines for human exposure to radiofrequency radiation in the region between the antenna feed and the reflector. Appropriate measure must also be taken to restrict access to other regions in which the earth station's power flux density levels exceed the specified guidelines.
4. Operations shall be consistent with applicable coordination agreements and satellite authorized bands.
5. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Iridium Satellite LLC's risk.
6. Grant of this STA is without prejudice to any determination that the Commission may make regarding other pending or future Iridium Satellite LLC applications.
7. Continued operations of SES-STA-2017052300591 with NEXT NGSO satellites during this extension was authorized pursuant to Section 1.62 of the Commission's rules, 47 C.F.R. §1.62 .

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release.

 GRANTED International Bureau	File # <u>SES-STA-20180119-00046</u>
	Call Sign <u>E960131</u> Grant Date <u>5-1-18</u> (or other identifier)
	Term Dates From: <u>5-1-18</u> To: <u>10-28-18</u>
	Approved: <u>Paul E. Hays</u>

2. Contact	
Name: Joseph A. Godles Esq.	Phone Number: 202-429-4900
Company: Goldberg, Godles, Wiener & Wright LLP	Fax Number: 202-429-4912
Street: 1025 Connecticut Ave, NW Ste 1000	E-Mail: jgodles@g2w2.com
City: Washington	State: DC
Country: USA	Zipcode: 20036
Attention:	Relationship: Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number SESSTA2017052300591 or Submission ID	
4a. Is a fee submitted with this application? <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other (please explain):	
4b. Fee Classification CGX – Fixed Satellite Transmit/Receive Earth Station	
5. Type Request <input type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other	
6. Requested Use Prior Date	

7. City Tempe	8. Latitude (dd mm ss.s h) 33 20 32.2
9. State AZ	10. Longitude (dd mm ss.s h) 111 53 48.5
11. Please supply any need attachments. Attachment 1: STA Narrative Attachment 2: Attachment 3:	
12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.) <div style="border: 1px solid black; padding: 5px;">Iridium Satellite LLC ('Iridium') pursuant to 47 CFR ss 25.120, and for the reasons set forth herein, requests extension of its special temporary authority ('STA') to operate its gateway earth station E960131 in Tempe, AZ in the manner described during the launch and early operations phase ('LEOP') of the Iridium NEXT constellation of satellites.</div>	
13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; party to the application; for these purposes. Yes <input checked="" type="radio"/> No <input type="radio"/>	
14. Name of Person Signing Maureen C. McLaughlin	15. Title of Person Signing Vice President, Public Policy
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).	

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

Iridium Satellite LLC and Iridium Constellation LLC (collectively, "Iridium"), pursuant to Section 25.120 of the Commission's Rules, hereby request an extension of special temporary authority ("STA") to operate their gateway earth stations located in Tempe, Arizona; Chandler, Arizona; and Fairbanks, Alaska, in the manner identified below.¹ Iridium seeks an extension of 180 days commencing on January 28, 2018.

Iridium's request is supported by good cause. The Commission previously granted STAs, initially for 30 and then for 180 days, so that Iridium can operate its gateway earth stations in the manner proposed herein.² These STAs enable Iridium to satisfy system requirements for TT&C during the launch and early operation phase ("LEOP") of Iridium NEXT. TT&C transmissions are essential to the implementation, health and safety of Iridium's constellation. By granting Iridium's initial STA requests, the Commission already has determined that the operations proposed in this extension request are in the public interest. Grant of an extension will provide continuing authority for these operations while LEOP continues through the next 180 days.

The Iridium NEXT constellation will consist of 66 active satellites and nine spare satellites. Iridium has launched 40 of these satellites, and four additional launches are scheduled for 2018.

The following operating parameters and non-interference showing were submitted with Iridium's initial STA requests and are repeated here for the convenience of the Commission:

Iridium's Tempe, Chandler, and Fairbanks gateway earth stations transmit and receive the feeder links and tracking, telemetry, and command ("TT&C") links for Iridium's non-geostationary satellite orbit, mobile satellite service constellation (call sign: S 2110).

The Iridium NEXT telecommand signals are transmitted on two carriers, a 29.102 GHz carrier and a 29.298 GHz carrier, using a bandwidth of 1 MHz and a 1M00F9D emission designator. Iridium seeks an STA extension authorizing it to transmit these

¹ The call signs for these gateway earth stations are E050282, E060300, E960131, and E960244. The licensee of the first three call signs is Iridium Satellite LLC. The licensee of the fourth call sign is Iridium Constellation LLC. This exhibit accompanies separate STA requests that Iridium is filing for each call sign.

² See Call Sign E960244, SES-STA-20160804-00716, SES-STA-20170523-00592; call sign E060300, SES-STA-20160804-00717, SES-STA-20170523-00590; call sign E050282, SES-STA-20160804-00718, SES-STA-20170523-00589; and call sign E960131, SES-STA-20160804-00719, SES-STA-20170523-00591.

carriers at 69.1 dBW EIRP and a 69.1 dBW/MHz EIRP density with a transmitter power of 11.7 dBW.

Iridium also seeks an extension of authority to operate both Iridium NEXT uplink carriers from its gateway earth station in Chandler, Arizona. Iridium's license for Chandler includes the 29.1-29.25 GHz portion of Iridium's feeder link band that encompasses the 29.102 GHz Iridium NEXT TT&C frequency, but does not include the 29.25-29.3 GHz portion of Iridium's feeder link band that encompasses the 29.298 GHz Iridium NEXT TT&C frequency.

In addition, Iridium seeks an extension of authority to use its Tempe, Chandler, and Fairbanks gateway earth stations to receive 13 Iridium NEXT telemetry carriers spaced at 400 kHz with center frequencies from 19400.2 to 19405 MHz. The emission designator for these telemetry carriers is 200KF9D.

Operating in the manner requested in this filing, moreover, presents no concerns of interference to the LMDS stations, Fixed Service stations, and Fixed-Satellite Service stations that share Iridium's TT&C/feeder link band.

LMDS stations. Iridium shares the 29.1-29.25 GHz portion of its uplink TT&C/feeder link band with LMDS. Iridium has coordinated its proposed uplink operations with LMDS licensees; coordination reports prepared by Comsearch were attached to the initial STA requests.

Fixed Service stations. Iridium shares its 19.4-19.6 GHz downlink TT&C/feeder link band with the Fixed Service. Iridium has coordinated its proposed downlink operations with Fixed Service licensees. Coordination reports prepared by Comsearch concerning those operations were attached to the initial STA requests.³

Geostationary Satellite Orbit ("GSO") Fixed-Satellite Service ("FSS") stations. The 29.25-29.3 GHz band Iridium uses to uplink its feeder link and TT&C transmissions is shared on a co-primary basis with GSO FSS stations. Iridium's Tempe and Fairbanks gateway earth stations have been operating on these frequencies for years.⁴

In order to avoid interference to Iridium's satellites, GSO FSS earth stations operate in the 29.25-29.3 GHz band only in areas that are widely separated from Iridium's gateway earth stations. There are fixed separations in the case of

³ Please note that the coordinates shown for Iridium's gateway earth stations in the Comsearch reports all are based on NAD83. The coordinates shown in the FCC license for Iridium's Chandler gateway earth stations are based on NAD27, and Comsearch converted the coordinates to NAD83.

⁴ Although Iridium's Chandler earth station has not been operating in the 29.25-29.3 GHz band, it is located only 8.5 km (*i.e.*, 5.3 miles) from Iridium's Tempe earth station, which has been operating in the 29.25-29.3 GHz band.

individually-licensed GSO FSS earth stations and exclusion zones around Iridium gateway earth stations in the case of blanket-licensed GSO FSS earth stations.

The separation distances required to avoid interference from GSO FSS earth stations to Iridium's satellites are far greater than the separation distances that are required to avoid interference from Iridium gateway earth stations to GSO FSS satellites. The locations at which GSO FSS stations transmit in the 29.25-29.3 GHz band, therefore, of necessity are locations that protect GSO FSS satellites against interference from Iridium gateway earth stations. In any event, the Iridium NEXT LEOP operations pursuant to the requested STA extensions will be on a secondary, unprotected, non-interference basis.

Conclusion

Accordingly, and for good cause shown, Iridium respectfully asks that its requests for STA extension be granted.