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September 25, 2018

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

Re: RBC Signals LLC – Section 1.65 Submission
File No. SES-STA-20180607-01103

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Commission’s rules, 47 C.F.R. § 1.65, RBC Signals LLC (“RBC Signals”) files this letter to request an emergency grant of the above-referenced request for special temporary authorization (“STA”) to communicate with two spacecraft, CICERO-7 (NORAD ID 43143, Int’l Code 2018-004AJ) and TYVAK-61C (NORAD ID 43144, Int’l Code 2018-004AK)¹ – operated by Tyvak Nano-Satellite Systems Inc. (“Tyvak”) – from RBC Signals’ existing earth station facility in Deadhorse, Alaska.

This request is necessitated by a failure of Tyvak’s primary TT&C earth station in Norway, which has left Tyvak unable to communicate with the subject spacecraft. RBC Signals highlights the emergency nature of this situation because Tyvak is currently unable to communicate with or control the satellites. As a result of a similar failure at the Norway facility approximately six months ago, RBC Signals was previously authorized for essentially identical TT&C operations from the Deadhorse facility and supported the satellite missions with no incidents or reports of interference.² Tyvak again requires TT&C support from RBC Signals, a ground station partner, because RBC Signals can provide immediate support for the spacecraft from its existing Deadhorse facility.

Grant of this STA request is critical for the ongoing reliability of the CICERO mission and will enable short-term continuation of TT&C services while Tyvak works to address the issue at the Norway earth station site. Tyvak is working diligently to resolve the matter but certain circumstances, including limited availability of personnel and the remote location of the Norway site, prevent immediate implementation of near-term remedial measures. It is estimated that initial diagnosis of the problem could take several days, and actual restoration could take several weeks given the remote location of the facility. In this connection, RBS Signals would note that it originally requested authority to conduct the

¹ The satellites operate under Norway filings TYVAK-0082 and TYVAK-0022, respectively. The two satellites were inadvertently both referred to as “CICERO spacecraft” or “CICERO satellites” in the STA narrative. This submission accurately reflects the names and catalog numbers of the satellites RBC Signals will support under this STA request. (See <https://www.n2yo.com/database/?q=cicero#results> and <https://www.n2yo.com/database/?q=tyvak#results>.) Because this STA request is for TT&C earth station operations only, RBC Signals has not provided the full range of satellite and market access information associated with requests to provide satellite services in the U.S. market.

² See RBC Signals LLC, File No. SES-STA-20180330-00293 (expired on April 29, 2018).

proposed TT&C operations for 60 days, which should afford enough time to correct the primary TT&C station in Norway.

RBC Signals' TT&C operations will be conducted in accordance with the operational parameters set forth in the draft FCC Form 312 submitted with the original STA request. In addition, they will be conducted on an unprotected and non-interference basis and only as-needed to communicate with the subject spacecraft as they pass over the Deadhorse TT&C earth station (several times per day with an average access time of five to seven minutes).

Please do not hesitate to contact me with any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jason Davila', with a stylized flourish at the end.

Jason Davila
Associate
LMI Advisors

cc: Paul Blais, FCC International Bureau