

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Application of RiteNet Corp. for 60-Day)	
Special Temporary Authorization to)	Call Sign: N/A
Operate Ku-band Earth Station Aboard)	File No. SES-STA-
Aircraft Terminals)	

APPLICATION FOR SPECIAL TEMPORARY AUTHORIZATION

RiteNet Corp. (“RiteNet”), pursuant to Section 25.120 of the Commission’s rules,¹ respectfully requests 60-day special temporary authorization (“STA”) to operate a previously authorized earth station aboard aircraft (“ESAA”) terminal to provide intelligence, surveillance, and reconnaissance (“ISR”) support for important United States Government (“USG”) security operations. Specifically, RiteNet seeks this STA to operate up to 50 SkyTech Model BB45 (“BB45”) ESAA terminals in the 14.0-14.5 GHz (Earth-to-space)² and 10.95-11.2 GHz, 11.45-11.7 GHz and 11.7-12.2 GHz (space-to-Earth) bands during the pendency of a currently filed ESAA blanket license application³ to deliver immediate, mission-critical communications under a long-term contract with U.S. Customs and Border Protection (“CBP”). Grant of this request will strongly serve the public interest and is consistent with the Commission’s ESAA operations.⁴

¹ 47 C.F.R. § 25.120.

² RiteNet will coordinate operations in the 14.0-14.2 GHz bands with potentially affected NASA TDRSS facilities, as well as operations in the 14.47-14.5 GHz band with potentially affected radioastronomy operations, before operating in these bands within the exclusion zones specified in the Commission rules. *See* 47 C.F.R. § 25.227(c) and (d).

³ *See* RiteNet Corp., File No. SES-INTR2019-00227 (filed Feb. 3, 2019).

⁴ 47 C.F.R. § 25.227.

I. DISCUSSION

RiteNet provides diverse satellite communications services for a range of USG customers, including long-term support for CBP. The BB45 terminal has been successfully demonstrated and operated with Ku-band geostationary satellite orbit (“GSO”) fixed-satellite service (“FSS”) satellites under previously granted experimental and commercial authority.⁵ RiteNet seeks the instant 60-day STA to enable near-term transition of terminal operations to the RiteNet network to provide immediate mission support to CBP during the pendency of an application for long-term ESAA blanket license authority.

Along with the technical and operational description included in this STA application, RiteNet’s existing USG contract vehicles and operational scope establish the pressing need for near-term operating authority. RiteNet provides the FCC Form 312 and Schedule B,⁶ as well as the Technical Appendix, for information relating to the proposed ESAA operations. As demonstrated in these materials, RiteNet will operate the BB45 terminal consistent with the Commission’s rules and policies governing ESAA operations.

A. ESAA Terminal

The BB45 terminal is an airborne stabilized antenna system that provides broadband satellite communications for aeronautical applications in Ku-band FSS frequencies. The antenna is mechanically steerable and is intended for tail or fuselage mounting. RiteNet seeks to operate the BB45 ESAA terminal on the RiteNet satellite network to support mission-critical ISR

⁵ See *UltiSat Inc.*, File No. 0201-EX-ST-2018 (granted Mar. 2, 2018), File No. SES-LIC-20180726-02089 (granted Nov. 21, 2018), File No. SES-STA-20180621-01477 (granted July 6, 2018).

⁶ Because of difficulties on the IBFS website, it is not currently possible to download the entire FCC Form 312 and Schedule B in a single document. As a result, the Form 312 and Schedule B attached to the STA application were assembled from individual electronic application pages on the IBFS website.

applications for CBP aircraft. This STA will allow RiteNet to begin immediate integration of the terminal into its network, thereby expanding support for CBP operations.

At all times, RiteNet will operate the BB45 terminal in permissible frequencies⁷ with satellites on the Commission's Permitted Space Station List ("Permitted List")⁸ and within the off-axis EIRP spectral density ("ESD") limits set forth in Section 25.227 of the Commission's rules. RiteNet will operate the BB45 terminal at off-axis ESD levels that are compliant with the Commission's two-degree spacing policy and thus it will protect adjacent satellite operations from harmful interference.⁹

In addition, the BB45 terminal: (i) meets the pointing accuracy requirements of Section 25.227(a)(1)(ii)(A) with a pointing accuracy of less than or equal to 0.2° between the orbital location of the target satellite and the axis of the main lobe of the ESAA antenna; (ii) automatically ceases emissions within 100 milliseconds if the angle between the orbital location of the target satellite and the axis of the main lobe of the ESAA antenna exceeds 0.5°; and (iii) does not resume transmissions until such angle is less than or equal to 0.2°.

RiteNet will maintain control of all transmissions and will cease transmissions immediately upon request of the satellite operator or other notice of harmful interference. The point of contact with control over the proposed ESAA operations is:

⁷ The frequencies requested in this application are available for ESAA operations with Permitted List satellites. *See* 47 C.F.R. § 25.115(k)(1).

⁸ The operating parameters of Permitted List satellites have been previously reviewed and approved by the Commission and will support RiteNet's operations throughout U.S., international, and foreign airspace, subject to compliance with the regulations of any overflowed nations governing Ku-band ESAA operations. *See* Approved Space Station List, available at: <https://www.fcc.gov/approved-space-station-list>; Permitted Space Station List, available at: <https://www.fcc.gov/permitted-space-station-list>.

⁹ *See* 47 C.F.R. § 25.227(a)(12).

RiteNet Network Operations Center
13665 Dulles Technology Drive, Suite 300
Herndon, VA 20171
Tel: 1-866-830-7610 and +1-703-391-9970
E-Mail: noc@artelllc.com

24/7 Emergency Contact:
XT Vuong
Tel: +1-703-371-5386
E-Mail: xvuong@artelllc.com

Additional information regarding the operational characteristics of the BB45 terminal can be found in the materials attached to this STA request.

B. STA Request & Public Interest Considerations

RiteNet 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, RiteNet seeks a commencement date of February 6, 2019. Additionally, the Commission may grant a 60-day STA if the request has not been placed on public notice and the applicant has filed a request for regular authority for the operations.¹⁰ RiteNet has concurrently filed an ESAA blanket license application to permit regular commercial operation of the BB45 terminal.

The unique circumstances here, including proposed operations that are essentially identical to those previously authorized,¹¹ warrant near-term temporary authority for BB45 operations on the RiteNet network. Further, this STA application involves "extraordinary

¹⁰ See 47 C.F.R. §25.120(b)(3); *see also supra* n. 3.

¹¹ *See supra* n. 5.

circumstances”¹² because RiteNet has an immediate need to support CBP operations on its network using terminals that have already been successfully demonstrated and tested.¹³

RiteNet’s proposed operations will serve the public interest by permitting immediate support for national security and border protection missions through commencement of regular operations on CBP aircraft. In addition, grant of the requested authority will allow RiteNet and its government partners to integrate the service and equipment with practical government applications and operations. The public interest will also be served by facilitating RiteNet’s ability to provide advanced, versatile, and easily deployable ESAA terminal solutions for U.S. government entities to the benefit of the U.S. public.

II. CONCLUSION

In view of the foregoing, the public interest would be served by a grant of the requested 60-day STA to allow RiteNet to operate the BB45 ESAA terminals to support its USG customers, commencing on February 6, 2019, or as soon as practicable thereafter.

¹² See 47 C.F.R. 25.120(b)(1).

¹³ See *supra* n. 5.