

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

In the Matter of

Application of Speedcast Communications)	Call Sign: E090176
Inc. for 30-day Special Temporary)	
Authorization (“STA”))	File No. SES-STA-_____

APPLICATION FOR SPECIAL TEMPORARY AUTHORIZATION

Pursuant to Section 25.120 of the rules of the Federal Communications Commission (the “FCC” or “Commission”),¹ Speedcast Communications Inc. (“Speedcast”) respectfully seeks 30-day special temporary authorization (“STA”), commencing on October 3, 2019, to continue to operate a previously licensed earth station onboard vessel (“ESV”) terminal – the 2.4m Intellian V240MT² – on a stationary drillship docked at a port in Mobile, Alabama (the “Port of Mobile”).³ Consistent with its existing STA for the identical operations proposed herein,⁴ Speedcast seeks to continue operations of V240MT terminal on the drillship, called the Noble Don Taylor, with the Galaxy 12 satellite located at the 129° W.L. orbital location in the 5925.0-5989.5 MHz (Earth-to-space), 6167.75-6241.54 MHz (Earth-to-space), 6271.54-6330.49 MHz (Earth-to-space) and 6360.49-6389.79 (Earth-to-space) MHz bands for transmit-only operations to support onboard personnel while the vessel is temporary docked in the Port of Mobile. Speedcast seeks this 30-day

¹ 47 C.F.R. § 25.120.

² See Speedcast Communications Inc., File No. SES-MOD-20151210-00928, Call Sign E090176 (“*ESV Blanket License*”). The V240MT is a technically identical, tri-band iteration of the V240M antenna, and operates with a slightly lower gain than the V240M. Here, Speedcast seeks to operate the V240MT in conventional C-band frequencies only.

³ Geographic coordinates: 30° 40’ 44.2” N, 88° 01’ 55.7” W.

⁴ See Speedcast Communications Inc., File No. SES-STA-20190827-01123, Call Sign E090176 (*Mobile STA*) (expires on October 3, 2019).

STA extension to ensure it has valid operating authority until such time as the vessel departs the Port of Mobile in October 2019.

Grant of this STA will serve the public interest because it will enable Speedcast to continue providing critical broadband connectivity for crew and other employees living aboard the drillship and ensure no lapse in services while the vessel is temporarily stationed at the port. Given the short duration that the Noble Don Taylor will remain docked at the Port of Mobile (less than a month), Speedcast does not currently need, nor anticipate the need for, long-term authority to operate the ESV terminal location.⁵ Once the drillship departs the Port of Mobile, Speedcast will resume supporting the vessel under the *ESV Blanket License*. During the STA term, the drillship will remain docked at all times and operation of the V240MT will continue to be fully consistent with the Commission's spectrum management policies, including two-degree satellite spacing, to ensure operations do not adversely affect other spectrum users. Speedcast resubmits the draft FCC Form 312 Schedule B and Technical Appendix provided with the *Mobile STA*, including information on the C-band transmit frequencies and power levels, a radiation hazard analysis⁶ and the final frequency coordination report for this site.

I. Discussion

In the *ESV Blanket License*, Speedcast has authority to operate the previously licensed V240MT terminal with any U.S.-licensed or non-U.S. licensed satellite on the Commission's C-band Permitted Space Station List ("Permitted List") at higher power levels than those proposed in this STA. However, Speedcast acknowledges that the V240MT authorization in the *ESV*

⁵ Because Speedcast does not anticipate filing an application for long-term authority, a 60-day STA was initially not appropriate as a lead application. *See* 47 C.F.R. § 25.120(b)(3).

⁶ The V240MT radiation hazard study was conducted using worst-case scenario power levels and, in reality, Speedcast will operate the antenna at a significantly lower input power (*see* draft FCC Form 312 Schedule B).

Blanket License is for mobile ESV terminals (*i.e.*, operating on vessels in motion beyond 200 km from the U.S. shoreline). In the event Speedcast seeks regular authority to operate at the Port of Mobile, it will file the required a C-band Notification pursuant to Section 25.221(a)(12) of the Commission's rules.⁷ Nonetheless, Speedcast engaged Micronet Communications Inc. ("Micronet") to complete coordination with all potentially affected U.S.-licensed fixed service operators onshore near the Port of Mobile.

A. Frequency Coordination

Pursuant to Sections 25.115(c)(2)(ii) and 25.203 of the Commission's rules, 47 C.F.R. §§ 25.115(c)(2)(ii) and 25.203, Micronet has conducted a coordination analysis on behalf of Speedcast and issued Prior Coordination Notices ("PCNs") that considers all existing, proposed and prior coordinated microwave facilities within the contours of the ESV terminal at the Port of Mobile. As demonstrated in the attached frequency coordination report,⁸ the proposed operations have been coordinated and limited as necessary and there is no potential for interference into other users of the C-band spectrum sought herein by Speedcast, and V240MT transmission are fully compatible with other FCC-licensed operations in the band.

Speedcast notes that, because the PCN period did not end until September 4, 2019, it filed the *Mobile STA* with the associated data sheet in order to help streamline the Commission's review and application processing. Here, Speedcast has provided the final coordination report

⁷ See 47 C.F.R. § 25.221; Public Notice *DA 05-1671* (Rel. June 15, 2005)

⁸ The V240MT was coordinated using worst-case scenario power levels, and in reality, Speedcast will operate the terminal at a significantly lower input power (*see* draft FCC Form 312 Schedule B). Moreover, the report assumes an antenna centerline height of 44.65 meters, which reflects the mounting height of the terminal on the drillship. Because the antenna is not installed onshore, the above mean sea level ("AMSL") is technically 0 meters above "ground" level. Practically, however, 44.65 meters is the AMSL height and was used to assess this interference analysis.

demonstrating that all potential interference cases that were identified by current licensees have been fully accounted for, and Speedcast has significantly limited its operations to ensure no interference into terrestrial operators.⁹ Micronet has concluded that the site will operate satisfactorily with the common carrier microwave environment and received no objections during the PCN period. Of course, if Speedcast learns of any interference issues at the end of the PCN period, it will immediately cease or modify its operations accordingly to prevent such interference.

B. STA Request & Public Interest Considerations

Section 25.120(a) provides that an STA request should be filed at least three business days prior to commence of proposed operations. Here, Speedcast has timely filed this 30-day STA request so that the Commission may permit operations by October 3, 2019. Moreover, Section 25.120(b)(4) states that the Commission may grant a temporary authorization for up to 30 days if the STA request has not been placed on public notice and the applicant does not plan to file a request for regular authority for the service. Speedcast seeks this STA to support the Noble Don Taylor drillship while it is temporarily docked at the port and it does not intend to file an application for long-term authority for the operations proposed hereunder. Once the vessel departs the Port of Mobile in October, Speedcast will resume supporting onboard operations under its *ESV Blanket License*. Pursuant to Commission rules and precedent, Speedcast understands that this timely filed extension request will effectively extend its current temporary authority until the Commission acts on the instant request.¹⁰

⁹ When transmitting from the Port of Mobile, Speedcast will limit its operations to the 5925.0-5989.5 MHz (Earth-to-space), 6167.75-6241.54 MHz (Earth-to-space), 6271.54-6330.49 MHz (Earth-to-space) and 6360.49-6389.79 MHz (Earth-to-space) bands.

¹⁰ See 47 C.F.R. §§ 25.120 & 25.163(b); Administrative Procedure Act § 9(b). See also 47 C.F.R. § 1.955(b); *In the Matter of Marc D. Sobel Application for Consent to Assign the License for Conventional 800 MHz SMR Station KKT934, Montrose, California*, Memorandum Opinion & Order, FCC 05-90, ¶¶ 2 & 6.

Grant of this 30-day STA will strongly serve the public interest by allowing Speedcast to deliver uninterrupted connectivity for personnel working and living onboard the vessel. Specifically, the terminal will be mounted atop the living quarters on the Noble Don Taylor and continue to provide a means of reliable broadband communications for the crew that otherwise may not be able to access terrestrial connectivity from offshore. More generally, this STA will help Speedcast demonstrate its operational flexibility to U.S. and international customers, helping to further establish U.S. leadership in maritime satellite connectivity.

II. Conclusion

Based on the foregoing, the public interest would be served by a grant of Commission authority to Speedcast to operate the V240MT terminal with Galaxy 12 in the C-band to support the Noble Don Taylor drillship while docked at the Port of Mobile, commencing on Thursday, October 3, 2019.