



REQUEST FOR SPECIAL TEMPORARY AUTHORIZATION

Pursuant to Section 25.120 of the Federal Communications Commission’s (“Commission”) rules, WorldVu Satellites Limited (“OneWeb”) respectfully requests special temporary authority (“STA”) for a period of up to 60 days (commencing on October 14, 2019) to operate its proposed Clewiston, FL Ka-band gateway earth station to communicate with in-orbit OneWeb satellites launched pursuant to OneWeb’s grant of U.S. market access.¹

Background

On July 27, 2018, OneWeb filed an application to operate a Ka-band gateway earth station consisting of thirteen antennas at a location in Clewiston, FL (“Clewiston SNP Application”).² The Clewiston gateway facility will be a critical part of OneWeb’s network infrastructure as it prepares to commence commercial service. Following the successful launch of the first six satellites in OneWeb’s non-geostationary orbit, fixed-satellite service (“NGSO FSS”) system in February 2019 and the July 2019 opening of OneWeb’s state-of-the-art satellite manufacturing facility in Florida, inauguration of OneWeb’s gateway earth stations will drive OneWeb’s ability to deliver innovative connectivity solutions to U.S. consumers.

As discussed above, the Clewiston SNP Application was filed on July 27, 2018.³ No party filed timely comments or objections to the grant of the Clewiston SNP Application. However, the Clewiston SNP Application remains pending at the Commission after over thirteen months.

Grant of STA Will Serve the Public Interest

Grant of STA to operate the Clewiston gateway will serve the public interest and the U.S. consumer by enabling OneWeb to take critical steps towards delivering its inevitable, innovative connectivity service across the entire United States. As noted above, the Clewiston SNP Application has been pending at the Commission for over thirteen months. OneWeb launched its first six satellites on February 27, 2019, approximately seven months ago.⁴ The grant of STA to

¹ See 47 C.F.R. § 25.120. See also *WorldVu Satellites Limited, Petition for a Declaratory Ruling Granting Access to the U.S. Market for the OneWeb NGSO FSS System*, Order and Declaratory Ruling, 32 FCC Rcd 5366 (2017) (“OneWeb Market Access Grant”).

² WorldVu Satellites Limited, Earth Station License Application, IBFS File No. SES-LIC-20180727-02075 (filed Jul. 27, 2018). To the extent necessary, all technical and operational information for the Clewiston gateway facility is incorporated herein.

³ *Id.*

⁴ See, e.g., Jackie Wattles, *OneWeb Launches First Batch of Internet Satellites*, CNN (Feb. 28, 2019, 7:02 PM), <https://www.cnn.com/2019/02/27/tech/oneweb-internet-satellite-launch/index.html>.



enable operation of the Clewiston gateway will serve the public interest by allowing OneWeb to implement network testing that is crucial for OneWeb's eventual deployment of service to U.S. consumers. Moreover, grant of STA to cover these kinds of operations is consistent with recent Commission actions to facilitate the use of gateway facilities for NGSO operators.⁵

Operation of the Clewiston gateway under STA would be on a non-interference basis. As submitted in the original application and in a supplemental filing, OneWeb has completed the required terrestrial coordination for the Clewiston SNP site.⁶ Additionally, OneWeb has completed coordination with the U.S. Department of Defense for the Clewiston SNP site, as required in OneWeb's grant of U.S. market access.⁷ OneWeb has also certified that its operations will comply with applicable power flux-density and equivalent power flux-density limits as set forth by the ITU and the Commission's rules.⁸ Beyond these already-completed coordination agreements and certifications, operation of the Clewiston SNP site on a non-interference basis under STA would ensure that there are no impacts to other spectrum users.

Conclusion

For the foregoing reasons, OneWeb respectfully requests STA for a period of up to 60 days, commencing on October 14, 2019.

⁵ See, e.g., *SpaceX Services, Inc., Request for Special Temporary Authority*, IBFS File No. SES-STA-20190410-00518 (May 9, 2019).

⁶ See Clewiston SNP Application, Exhibit B; see also Letter from Brian D. Weimer, Counsel to WorldVu Satellites Limited, to Jose P. Albuquerque, Chief, Satellite Division, International Bureau, FCC, IBFS File Nos. SES-LIC-20180604-01082, *et al.* (Aug. 7, 2019).

⁷ See OneWeb Market Access Grant at ¶ 24(c).

⁸ See Letter from Brian D. Weimer, Counsel to WorldVu Satellites Limited, to Marlene H. Dortch, Secretary, FCC, IBFS File No. SAT-LOA-20160428-00041 (Mar. 14, 2019).