

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

In the Matter of

Application of Speedcast Communications) Call Sign: E910609
Inc. for 60-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 60-day special temporary authorization (“STA”), commencing on Monday, November 4, 2019. Consistent with its existing authority for identical operations,² Speedcast seeks to continue to operate its previously licensed very small aperture terminal (“VSAT”) remotes,³ as well as the VSAT remotes in its pending application to modify the *VSAT Blanket License*,⁴ in Alaska, Hawaii, the contiguous United States (“CONUS”) and all U.S. Territories⁵ with the Intelsat-19 (“IS-19”) satellite in the 11.7-12.2 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space) bands.

¹ 47 C.F.R. § 25.120.

² See Speedcast Communications Inc. file No. SES-STA-20190815-01100 (expires on November 4, 2019).

³ See Speedcast Communications Inc., File No. SES-RWL-20110901-01016, Call Sign E910609 (“*VSAT Blanket License*”).

⁴ See Speedcast Communications Inc., File No. SES-MOD-20190225-00191, Call Sign E910609 (“*VSAT License Modification Application*”). In the *VSAT License Modification Application*, Speedcast seeks to add two terminal types – the Intellian V240M and V240MT – to operate in conventional Ku-band and Ka-band frequencies. No Ka-band operating authority is sought as part of this STA request.

⁵ The Intellian V240M and V240MT are currently authorized to operate within CONUS under Call Sign E910609, this request will ensure the third VSAT remote type (the Sailor 900) has the same operating authority. Speedcast intends the term “U.S. Territories” to encompass Puerto Rico, the U.S. Virgin Islands, Guam, the Commonwealth of the Northern Mariana Islands, and American Samoa.

Speedcast also seeks to continue operation of up to ten (10) units of a new terminal type – the Cobham Sailor 900 – to communicate with IS-19 in the same Ku-band frequencies and locations. This STA request will ensure Speedcast has appropriate authority during the Commission’s ongoing review of the *VSAT License Modification Application*, inclusive of the forthcoming amendment that reflects the operations herein.

Grant of this STA will serve the public interest because it will enable Speedcast to continue providing improved broadband connectivity to remote areas of the United States that are unable to rely on traditional terrestrial infrastructure to support communication needs, including the ability to deliver vital satellite backhaul support for a local terrestrial network. Speedcast will file an amendment to the pending *VSAT License Modification Application* in the very near-term to ensure appropriate regular authority for the operations proposed herein.

I. Discussion

In the *VSAT Blanket License*, Speedcast has authority to operate the previously licensed VSAT remotes with any U.S.-licensed or non-U.S. licensed satellite on the Commission’s Ku-band Permitted Space Station List (“Permitted List”) and seeks no changes to the authorized power levels for each remote. Thus, Speedcast already has *de facto* authority to operate its previously licensed VSAT remotes with the IS-19 satellite. However, Speedcast acknowledges that the authorized area of operations in the *VSAT Blanket License* is limited to the contiguous United States (“CONUS”), and thus seeks this STA to allow continued operations in Alaska and Hawaii for its previously authorized VSAT remotes.

This STA request is also consistent with Speedcast’s pending *VSAT License Modification Application*, which seeks authority to operate two (2) new terminal types in the CONUS with any

satellite on the Permitted List using previously approved parameters.⁶ Speedcast plans to file an amendment to the *VSAT License Modification Application* in the near-term to include a request to expand the area of operations to include Hawaii and Alaska and all U.S. Territories, as well as add the Sailor 900 VSAT remote for permanent operations. To the extent applicable, Speedcast incorporates by reference the information submitted in support of the *VSAT License Modification Application* and provides the attached *pro forma* FCC Form 312 Schedule B for information relating to the proposed Sailor 900 operations, as well as a radiation hazard analysis for the Sailor 900.⁷ Operation of the previously *unlicensed* VSAT remotes – the V240M, V240MT and Sailor 900 – will be fully consistent with the Commission’s spectrum management policies, including two-degree satellite spacing, and will not adversely affect the operations of other spectrum users. speed

II. 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 60-day STA request so that the Commission may permit operations by November 4, 2019. Moreover, Section 25.120(b)(2) states that the Commission may grant a temporary authorization for up to 60 days if the STA request has not been placed on public notice and the applicant plans to file a request for regular authority for the service. As noted, the *VSAT License Modification Application* is on file with the Commission and Speedcast plans to amend the application to permit long-term authority

⁶ See Speedcast Communications Inc., File No. SES-MOD20151210-00928, Call Sign E09017. Speedcast will operate the V240M and V240MT using the identical previously authorized power levels in Call Sign E090176 and at all times in compliance with the relevant EIRP spectral density masks in Section 25.218(f) Commission’s rules.

⁷ The radiation hazard analysis is calculated using the maximum BUC power, in reality, Speedcast will operate below the maximum power at all times.

for the operations proposed hereunder. This STA request will ensure Speedcast has appropriate authority during the Commission's review of the *VSAT License Modification Application*, including the amendment. 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.⁸

Grant of this 60-day STA will strongly serve the public interest by allowing Speedcast to continue supporting certain local terrestrial network services by leveraging Speedcast's satellite backhaul infrastructure. More generally, this STA will help to bridge the digital divide and improve access to resources, materials and opportunities made available by reliable broadband connectivity. Finally, grant of this STA request will allow Speedcast to further expand its network, create an additional competitive alternative for customers in these remote U.S. communities with little access to telecommunications connectivity.

III. Conclusion

Based on the foregoing, the public interest would be served by a grant of Commission authority to Speedcast to operate the specified VSAT remotes with the IS-19 satellite in the Ku-band by Monday November 4, 2019.

⁸ 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.