

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 25.120 of the Commission's rules,¹ Telesat Network Services, Inc. ("TNSI") hereby requests special temporary authority ("STA") to operate a Ka-band antenna in Port St. Lucie, Florida for a period of thirty (30) days, commencing on December 2, 2019, in the manner described below. The Ka-band antenna will be used to provide testing support for a Ka-band earth station being constructed in Middletown, Virginia (the "Middletown gateway")² that will serve as a backup gateway for the Telstar 19 VANTAGE satellite ("T19V").³

Testing of the Middletown gateway will be conducted via transmissions both to and from the Ka-band antenna in Port St. Lucie. Test carriers sent from Middletown will be received at Port St. Lucie so the transmit antenna pattern of the Middletown gateway can be measured. And test carriers sent from Port St. Lucie will be received at Middletown so the Middletown gateway antenna's cross-polarization receive gain can be measured.

Technical specifications for the proposed operations in Port St. Lucie are set forth in an attachment hereto, which provides the information that would be appear in Schedule B of FCC Form 312 if regular authority were being sought. A radiation hazard study for the proposed operations also is attached. TNSI will coordinate its STA

¹ 47 C.F.R §25.120

² Telesat Network Services, Inc., FCC Callsign E160134. The testing itself is expected to take place within a single day, but TNSI is requesting an STA for 30 days because the start date for the testing is uncertain. TNSI currently projects it will complete construction of the Middletown gateway in late December 2019. Although TNSI is making every effort to accelerate this process, there are multiple contingencies, including the need for a faulty waveguide to be remanufactured and installed. Out of an abundance of caution, TNSI has requested an extension through March 10, 2020 to complete construction. See Telesat Network Services, Inc., Application to Further Extend Construction Deadline of Transmit/Receive Earth Station in Middletown, VA, FCC Callsign E160134, IBFS File No. SES-MOD-20191015-01323.

³ The licensee for T19V is Telesat International Limited, a commonly controlled affiliate of TNSI.

operations with the U.S. federal government under footnote US334 of the United States Table of Frequency Allocations.⁴

The Middletown gateway will support high capacity links to customers in the Caribbean, and a back-up gateway facility is a diversity requirement of these customers. Grant of TNSI's STA request is in the public interest because it will facilitate testing of the Middletown gateway antenna that is needed to initiate service in accordance with the terms of TNSI's Middletown license.

Accordingly, and for good cause shown, TNSI requests that the Commission grant its STA request.

⁴ TNSI has answered "no" to question E18 in Schedule B, thereby indicating that frequency coordination is not required, based on its understanding that the question is limited to non-federal government coordination requirements, if any.