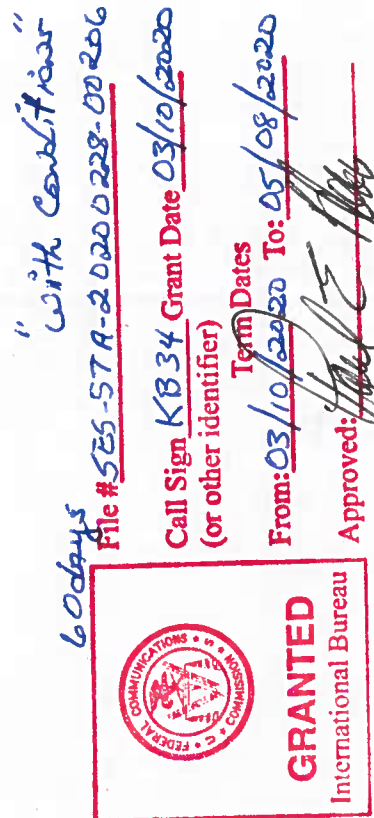


APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Special Temporary Authority to Communicate with Drifting I3F2

I. Applicant

Name:	Comsat, Inc.	Phone Number:	805-933-4010
DBA Name:		Fax Number:	571-599-3670
Street:	2550 Wasser Terrace Suite 6000	E-Mail:	hwisniewski@comsat.com
City:	Herndon	State:	VA
Country:	USA	Zipcode:	20171
Attention:	Howard Wisniewski		



2. Contact	
Name: James G. Lovelace	Phone Number: 571-599-3643
Company:	Fax Number: 571-599-3670
Street: 2550 Wasser Terrace Suite 6000	E-Mail: jlovelace.ctr@comsat.com
City: Herndon	State: VA
Country: USA	Zipcode: 20171 -
Attention:	Relationship: Other
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number SESMFS2019042500550 or Submission ID	
4a. Is a fee submitted with this application? ☒ If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). ☐ Governmental Entity ☐ Noncommercial educational licensee ☐ Other (please explain):	
4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station	
5. Type Request	
☒ Use Prior to Grant	☐ Change Station Location ☐ Other
6. Requested Use Prior Date 03/02/2020	
7. City Santa Paula	8. Latitude (dd mm ss.s h) 34 24 5.0 N

9. State CA	10. Longitude (dd mm ss.s h) 119 4 29.4 W
11. Please supply any need attachments. Attachment 1: STA Justification	Attachment 2: Attachment 3:
12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)	COMSAT, Inc. (COMSAT) respectfully requests a grant of Special Temporary Authority for a period of 60 days to allow COMSAT to operate its Santa Paula, California Teleport 12.8 Meter Hub Antennas to communicate with the Inmarsat 3F2 Satellite (I3F2) using L-band and C-band frequencies to support Inmarsat testing during drift of I3F2. The primary antenna
13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.	☒ Yes ☐ No
14. Name of Person Signing Howard Wisniewski	15. Title of Person Signing Teleport Engineer
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).	

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

12. Description

COMSAT, Inc. (COMSAT) respectfully requests a grant of Special Temporary Authority for a period of 60 days to allow COMSAT to operate its Santa Paula, California Teleport 12.8 Meter Hub Antennas to communicate with the Inmarsat 3F2 Satellite (I3F2) using L-band and C-band frequencies to support Inmarsat testing during drift of I3F2. The primary antenna to be used for this purpose is authorized on COMSAT's KB34 license (SES-MFS-20190425-00550 - referenced in block 3 above) and the back up antenna is authorized on COMSAT's KA31 license (SES-MOD-20151009-00715).

Applicant: COMSAT, Inc.
File No.: SES-STA-20200228-00206
Call Sign: KB34
Special Temporary Authority



"With Conditions"
File # SES-STA-20200228-00206
Call Sign KB34 Grant Date 03/10/2020
(or other identifier)
Term Dates
From: 03/10/2020 To: 05/08/2020
Approved: [Signature]

COMSAT, Inc ("COMSAT") is granted a special temporary authority for 60 days, beginning March 10, 2020, to utilize its Santa Paula, California Teleport 12.8 Meter Hub Antennas to communication with the Inmarsat 3F2 Satellite (I3F2) at the 15.5° orbital location using L-band and C-band frequencies to support Inmarsat testing during drift to its final orbit using the following frequencies: 1638.90 MHz 1639.18 MHz, 1639.22 MHz, (RHCP) (Earth-to-space) and 1537.29 MHz, and 1537.295 (space-to-Earth); and 6423.5 MHz, 6421.5 MHz, 6341.5 MHz, and 6339.5 MHz, (Earth-to-space) and 3950.6 MHz, and 3928.5 MHz (space-to-Earth) under the following conditions:

1. Operations will not exceed the operational power levels and parameters in KB34.
2. All operations under this grant of special temporary authority shall be on an unprotected and non-harmful interference basis. COMSAT shall not cause harmful interference to and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
3. In the event of any harmful interference under this grant of special temporary authority. COMSAT must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
4. All operators of satellites will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs, Currently the 24x7 contact information for COMSAT testing mission is Ph.: (805) 933-4010 (Network Operations Center).
5. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at COMSAT's risk.
6. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future COMSAT applications.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective immediately.

COMSAT, Inc.

Request for Special Temporary Authority to
Operate Santa Paula Teleport 12.8 Meter Hub Antennas to
Communicate with Inmarsat 3F2 Satellite to
Support Inmarsat Testing During Drift of Satellite

File Number SES-MFS-20190425-00550
Call Sign KB34

COMSAT, Inc. ("COMSAT") respectfully requests a grant of Special Temporary Authority ("STA") effective March 2, 2020 to allow COMSAT to operate its Santa Paula, California Teleport 12.8 Meter Hub Antennas (SAPA 12.8M) to communicate with the Inmarsat 3F2 Satellite (I3F2) using L-band and C-band frequencies to support Inmarsat testing during drift of I3F2.

I3F2 was formerly located at 15.5 west longitude and was authorized by the Commission for U.S. Market Access and was on the ISAT list. Inmarsat has advised COMSAT that I3F2 is reaching the end of its operational life and that Inmarsat is conducting operational tests to look at potential ways of extending its life further. Inmarsat has elected not to deorbit the satellite at this time, and Inmarsat retains full control of the spacecraft and its current orbit is specified in the CARABINER filings submitted to the ITU by the UK administration.¹ Inmarsat has contracted with COMSAT to support testing of the satellite during that part of its drift arc in which it can be seen from COMSAT's Santa Paula teleport. Inmarsat states that the satellite is not being drifted to a new GEO slot and Inmarsat is not seeking market access for I3F2 in its new orbit at this time. This STA is sought only for limited testing purposes in the new orbit.

The STA that is needed for this purpose is to operate the SAPA12.8M antennas to communicate with I3F2 during its drift utilizing the following emissions:

#	Frequency (MHz)	Polarization	Emission	Tx/Rx	Max EIRP /Carrier Density (dBW)	Max EIRP Density (dBW/4kHz)	Modulation
Pilot	1638.900	RHC	N0N	T	33	33	Pilot
Test Carrier 1	1639.180	RHC	10K0G1E	T	42	38	PSK
Test Carrier 2	1639.220	RHC	10KG01E	T	42	38	PSK
Test Carrier 3	1537.290	RHC	5K00G1E	R			PSK

¹ The API and CR/C filings may be found on the Space Network Systems Online database at https://www.itu.int/online/sns/nongeo.sh?ntc_id=119545143&sat_type=N&ie=&wic_no=2912&categ=A and https://www.itu.int/online/sns/nongeo.sh?ntc_id=119520185&sat_type=N&ie=&wic_no=2913&categ=C, respectively.

Test Carrier 4	1537.295	RHC	5K00G1E	R			PSK
Omni TT&C 1	6421.500	RHC	800KFXD	T	80	57	FSK
Omni TT&C 2	6423.500	LHC	800KFXD	T	80	57	FSK
TM1	3950.600	RHC	800KFXD	R			FSK
Global TT&C 1	6339.500	RHC	800KFXD	T	73	50	FSK
Global TT&C 2	6341.500	RHC	800KFXD	T	73	50	FSK
Aux TM	3928.500	LHC	800KFXD	R			FSK

The SAPA 12.8M antennas to be used for these communications (one as the primary and the second as the back-up) are currently authorized per COMSAT's KB34 (the primary) and KA31 (the back-up, File Number SES-MOD-20151009-00715) licenses to communicate in the L-band and C-band with ISAT list satellites generally as well as specifically named Inmarsat satellites within the view of the Santa Paula teleport. The antennas have been successfully coordinated for C-band transmissions across the entire satellite arc (46.0 W.L. – 190.0 W.L. and 48.0 W.L. – 190.0 W.L., respectively). The power levels and other particulars used for the testing will be well within the levels authorized by the licenses.

Inmarsat has notified other operators of the ongoing drift maneuver. C-band transmissions will only be utilized for telemetry, telecommand, and control operations. Inmarsat will observe a one degree command hinder silence to affected satellites. Inmarsat will further endeavor to notify and coordinate if any commanding or ranging is needed within this one degree window.

Grant of the STA for the testing is in the public interest because Inmarsat services supported by I3 satellites include maritime services used for Safety at Sea as well as services used by various U.S. agencies. It is therefore respectfully requested that STA as described above be granted for a period of 60 days, effective March 2, 2020.

Any questions with respect to this matter may be directed to James G. Lovelace at 571-599-3643.