

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

In the Matter of

Application of Speedcast Communications) Call Sign: E090176
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, April 27, 2020 or as soon as practicable thereafter, to operate up to one hundred (100) units of a previously licensed earth station onboard vessel (“ESV”) terminal² – the 2.4m Intellian V240MT³ – in Ku-band frequencies from 11.7-12.2 GHz (space-to-Earth) and 14.0-14.5 GHz (Earth-to-space), and Ka-band frequencies from 18.3-18.8 GHz (space-to-Earth), 19.7-20.2 GHz (space-to-Earth), 28.35-28.6 GHz (Earth-to-space) and 29.3-30.0 GHz (Earth-to-space).

Grant of this STA will serve the public interest because it will enable Speedcast to deliver improved broadband connectivity to guests, crew and staff onboard vessels in U.S. and international waters, including cruise ships, which is particularly important given the recent

¹ See 47 C.F.R. § 25.120.

² ESVs are now included in a broader category of broadband satellite mobility terminals called earth stations in motion (“ESIMs”) and governed by Section 25.228 of the Commission’s rules, 47 C.F.R. § 25.228.

³ See Speedcast Communications Inc., File No. SES-MOD-20151210-00928, Call Sign E090176 (“*Speedcast ESV License*”) (granting authority to operate the V240M in the C-band). The V240MT is the 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 Ku-band and conventional Ka-band frequencies only.

COVID-19 emergency situations highlighting the critical nature of reliable maritime communications. Moreover, grant of this STA will allow Speedcast to deploy the terminal during the pendency of its forthcoming application to add the V240MT for regular ESV operations under the *Speedcast ESV License*.

I. Discussion

At all times, Speedcast will operate the V240MT ESV terminal consistent with the Commission's rules governing ESV operations.⁴ In the Ku-band, Speedcast will operate the V240MT at off-axis EIRP spectral density ("ESD") levels in compliance with the mask provided in Section 25.218(f) of the Commission's rules.⁵ Moreover, during Ku-band operations, the V240MT will communicate with the U.S.-licensed Telstar 12V satellite located at the 15° W.L. orbital location. In the Ka-band, Speedcast will operate the V240MT at off-axis ESD levels within the limits specified in Section 25.218(i) of the Commission's rules⁶ and communicate with the U.S.-license Telstar 19V located at the 63° W.L. orbital location. Speedcast provides a draft FCC Form 312 Schedule B for information relating to the proposed earth station operations and a Technical Appendix with radiation hazard analyses and off-axis ESD plots demonstrating compliance with the relevant Ku-band and Ka-band masks.⁷

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

⁴ See 47 C.F.R. § 25.228(d).

⁵ See 47 C.F.R. § 25.218(f).

⁶ See 47 C.F.R. § 25.218(i).

⁷ In the draft FCC Form 312 Schedule B, Speedcast provides separate entries for V240MT Ku-band and Ka-band operations, but confirms it will operate a total of 100 dual-band terminals.

request so that the Commission may permit operations by Monday, April 27, 2020. 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, Speedcast plans to file an application shortly to permit regular operation of the V240MT under the *Speedcast ESV License* along with other ESV terminals. This STA request will ensure Speedcast has appropriate authority during the Commission's review of the *Speedcast ESV License* modification application.

Grant of this 60-day STA will strongly serve the public interest by allowing Speedcast to immediately implement this next-generation terminal on cruise ships and vessels in motion, where reliable broadband connectivity for guests, crew and staff is more important than ever. Moreover, this STA will allow Speedcast to provide more efficient and flexible services in the United States and promote next-generation commercial deployments. In addition, operation of the V240MT terminal will be fully consistent with the Commission's spectrum management and ESV policies, including two-degree satellite spacing, and will not adversely affect the operations of other spectrum users.

III. Conclusion

Based on the foregoing, the public interest would be served by a grant of Commission authority to Speedcast to operate the V240MT ESV terminal in conventional Ku-band and Ka-band frequencies to support vessels in motion in U.S. and international waters.