

APPLICATION FOR SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 25.120 of the Commission's rules,¹ the American Samoa Telecommunications Authority ("ASTCA") seeks a 30-day special temporary authorization ("STA")² to operate a temporary fixed satellite service ("FSS") VSAT network system in the 19.8-19.95 GHz and 29.6-29.7 GHz bands at the following locations in the Manu'a islands:

Requested Locations for VSATs ³		
Location	Latitude	Longitude
Ofu	14° 10' 32.72" S	169° 37' 30.23" W
Ta'u	14° 13' 24.88" S	169° 30' 40.69" W

The VSATs will communicate with the Kacific 1 space station. While Kacific 1 is not yet on the Commission's approved space station list, a 30-day STA to communicate with Kacific 1 would serve the public interest because: (1) Kacific 1 currently seeks U.S. market access;⁴ (2) Kacific 1 is licensed by Japan, which is a well-respected member of the International Telecommunication Union ("ITU");⁵ and (3) Kacific 1 launched from Cape Canaveral, FL, in December 2019 on SpaceX's Falcon 9,⁶ which underwent safety, policy, and payload reviews to obtain its commercial space transportation license from the Federal Aviation Administration (FAA).⁷

As shown below, a delay in instituting these temporary operations would seriously prejudice the public interest. Extraordinary circumstances require temporary operations so that ASTCA may provide basic communications – including safety of life and emergency communications – to the Manu'a islands' roughly 1,400 residents.⁸

¹ 47 C.F.R. § 25.120.

² The Commission may grant a 30-day STA without placing the application on public notice and "regular authority is not contemplated." 47 C.F.R. § 25.120(b)(4). Therefore, this application does not need to go on public notice. Additionally, because ASTCA plans to repair the cable break, ASTCA does not contemplate obtaining regular authority for the temporary VSAT network subject to this application. However, ASTCA is reviewing additional satellite capacity for restoral purposes and will prepare a full application to operate earth station facilities to rely on that capacity.

³ ASTCA clarifies that it has filed separate STA applications for the Ofu and Ta'u locations but formatted this narrative to cover both applications. Hence, both locations are listed in this narrative.

⁴ See IBFS File No. SES-LFS-20210521-00824.

⁵ See IBFS File No. SES-LFS-20210521-00824, Narrative at 2 ("The Kacific-1 satellite is licensed by Japan.").

⁶ Rachel Jewett, *Via Satellite*, "SpaceX Launch Delivers Payloads for Sky Perfect JSAT, Kacific," <https://bit.ly/3AUZOsp> (Dec. 17, 2019).

⁷ See Commercial Space Transportation License No. LLO 19-110 (Rev 2), <https://bit.ly/3hxd7aS> (eff. Nov. 8, 2019) (authorizing Space Exploration Technologies to conduct "[f]lights of Falcon 9 . . . from Launch Complex 39A at Kennedy Space Center . . . [to] transport[] a payload to a low Earth or geosynchronous transfer orbit"); see also FAA, *Getting Started with Licensing*, "Commercial Space Transportation Process – Site/Vehicle Operator License," <https://bit.ly/3yV5JMx> (May 3, 2021) (outlining the space transportation licensing process, including safety, policy, and payload reviews).

⁸ 47 C.F.R. § 25.120(b)(1).

I. A BREAK IN THE SUBMARINE CABLE CONNECTING AUNU'U AND TA'U ISLANDS CREATED A COMPLETE SERVICE BLACKOUT FOR THE RESIDENTS OF THE MANU'A ISLANDS.

On June 26, 2021, ASTCA registered a full-service outage in the Manu'a islands.⁹ The outage caused the Manu'a islands' residents to lose landline, broadband, television, and mobile services. Further complicating matters, inclement weather and rough seas between Tutuila, the largest island in American Samoa, and the Manu'a islands prevented ASTCA from sending its rapid-deployment teams and emergency equipment to attempt service restoration.

On June 27, 2021, ASTCA chartered a flight from Tutuila to the Manu'a islands to troubleshoot and run diagnostic tests. ASTCA's engineering teams determined that the on-island infrastructure appeared to be functioning properly, but continuing inclement weather prevented the team from determining precisely where the signal break occurred (e.g., the island, at the landing site, or in the ocean).

Between June 28 and June 30, 2021, ASTCA confirmed that the fiber link between the Aunu'u and Ta'u islands had broken and thus caused the service outage. Ta'u is the largest island in the three Manu'a islands, and the breakage disrupted service to the entire population of the island group. ASTCA determined that over time, repeated pressure against coral rock deteriorated the fiber cable, and the fiber cable broke at a point 592 feet away from the Ta'u shoreline.

Based on ASTCA's conversations with vendors, no ship is available to fix the submarine cable at reasonable cost until late August or early September.

II. SPECIAL TEMPORARY AUTHORITY WILL ALLOW ASTCA TO PROVIDE BASIC COMMUNICATIONS, INCLUDING PUBLIC SAFETY AND EMERGENCY COMMUNICATIONS, TO THE MANU'A ISLANDS WHILE ASTCA REPAIRS THE SUBMARINE CABLE AND RESTORES NORMAL SERVICE.

The Commission may grant a temporary authorization upon a finding that there are extraordinary circumstances requiring temporary operations in the public interest and that delay in the institution of these temporary operations would seriously prejudice the public interest.¹⁰

Such circumstances exist here. The distance between the Manu'a islands and ASTCA's facilities in Tutuila prevents ASTCA from installing a temporary terrestrial network. Heavy rains have impeded efforts to assess and install temporary service that allowed at least messaging applications for the Manu'a residents. Additionally, due to service crew unavailability and American Samoa's remote location, ASTCA will be unable to repair the affected submarine cable – and thus restore normal service to the Manu'a islands – until late August or early September. An STA for the requested VSAT operations would serve the public interest by allowing ASTCA to provide residents on the Manu'a islands with basic communications services, including those for safety of life and emergency purposes, while ASTCA repairs the submarine cable to restore normal service.

⁹ The Manu'a islands, Ofu, Olosaga and Ta'u, are located 68 miles away from Tutuila, American Samoa's main island.

¹⁰ 47 C.F.R. § 25.120(b)(1).