

Explanatory Statement – Request for Special Temporary Authority for Launch Services

Comtech Telecommunications Corp. (“Comtech”), pursuant to Section 25.120 of the Commission’s rules, hereby requests Special Temporary Authority (“STA”) to operate its fixed transmit/receive earth station at Yona, Guam for a period of up to 180 days to communicate with satellites to be launched during this period by the Japan Aerospace Exploration Agency (“JAXA”). The launch window is intended to cover two separate launches during which Comtech’s monitoring services will be required. The first launch is Test Flight #1 for a new launch vehicle (H3), which will occur as early as December 20, 2022 and will place into a low-earth sun synchronous orbit the third Advanced Land Observation Satellite (“ALOS-3”). The second launch, using legacy launch vehicle (H2A), will place the Information Gathering Satellite (IGS) into a low-earth Sun Synchronous orbit, and is expected to occur at some point during the first quarter of 2023, beginning as early as the third week of January. A full 180-day STA is requested to allow for potential launch slippage in each case.

The operational parameters of the earth station, which is currently covered by an experimental authorization issued by the FCC’s Office of Engineering and Technology under Call Sign WC2XWA, are as provided in the table below:

Antenna Diameter	5.4 meters	Effective Radiated Power	4 MW
Antenna Manufacturer	Viasat	Maximum EIRP/Carrier	68.1 dBW
Antenna Model	EL/AZ Full Motion	Maximum EIRP Density/Carrier	68.1 dBW/4kHz
Center Frequencies	2070.96 MHz 2093.46 MHz 2108.34 MHz	Polarization	Left or Right Circular
Antenna Transmit Gain	36.4 dBi	Emission Designator	1M00F1D
Antenna Receive Gain	38.7 dBi		

The Commission has good cause to approve this request, which would permit Comtech to communicate with the referenced satellites and launch vehicles and conduct monitoring during the initial launch and/or orbit-raising phases of operation. The requested STA would allow Comtech to assist JAXA in confirming the operational status of its launch vehicles and satellites, as applicable. This capability would enhance the safety of space and yield other public interest benefits by facilitating the launch of new scientific and communications satellite capacity.

Comtech will operate its earth station on a non-interference basis with respect to other authorized spectrum users in shared spectrum bands. Comtech will coordinate all operations with NASA prior to transmission. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Comtech will take all reasonable steps to eliminate the interference as quickly as possible.

Should an issue arise with the launch operations, Comtech can be reached at the following email addresses or telephone numbers, which provide 24/7 communication with on-site engineering personnel –

Keith Cha
Keith.cha@comtech.com
(M) 310-294-4986
(Guam) 671-688-2291

Secondary contact on site
Rene Pantaleon
Station Manager
Rene.pantaleon@comtech.com
671-688-1642

Accordingly, Comtech requests that the Commission issue it an STA commencing no later than December 20, 2022 and continuing for a period of 180 days covering the above-described operations.