

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

TeleCommunications Systems, Inc. (“Comtech TCS”)¹ hereby requests special temporary authority (“STA”) in connection with its application filed February 8, 2019 to modify the license for its C-band satellite Earth station license at Yona, Guam (Call Sign E090026) to add an antenna, increase power and maximum EIRP and modify emissions (IBFS File No. SES-MOD-20190208-00087)(“Modification Application”). Comtech TCS requires authority to operate the modified facilities beginning Monday, April 8, 2019, the first date that the pending Modification Application may be eligible for grant.² However, because Guam is fourteen hours ahead of the North American Eastern Time Zone, even a grant at 8 a.m. on Monday, April 8, 2019 would come after the end of the business day on Guam. Accordingly, an STA grant prior to April 8th and effective as of that date is required to commence testing in timely fashion as described below.

Authority to commence transmissions on April 8th is necessary in order to allow testing of the new antenna at the revised operating parameters to validate expected performance in connection with anticipated upcoming use for launch monitoring activities under contract to the Japan Aerospace Exploration Agency (“JAXA”). Testing must be coordinated with other facilities on the island and has been planned for several months. Comtech TCS is a long-term FCC licensee, and the Commission has previously reviewed and approved its qualifications to operate this satellite Earth station facility. Accordingly, there is no need for delay in granting Comtech TCS permission to operate an additional antenna at this site, on a temporary basis, without prejudice to final action on the pending Modification Application.

Comtech TCS has filed this application in compliance with Section 25.120(a) of the FCC’s Rules in advance of the requested transmission date. Comtech TCS seeks grant of an STA to permit it to operate the subject facilities, and, as detailed above, respectfully requests that action on this matter be completed before Monday, April 8, 2019, providing Comtech TCS with the assurance that it can proceed with its testing program on that date. Consistent with the FCC’s Rules concerning authority for use prior to grant, Comtech TCS requests an STA for a period of up to 60 days. *See* 47 C.F.R. §25.120(b)(3).

¹ TeleCommunications Systems, Inc. is a wholly-owned subsidiary of Comtech Telecommunications Corp.

² The Modification Application was placed on the Satellite Division’s Accepted for Filing Public Notice on March 9, 2019, and therefore does not become eligible for grant until thirty (30) days later. *See* FCC Public Notice, Satellite Communications Services re: Satellite Radio Applications Accepted for Filing, Report No. SES-02142, at 13-14 (released March 6, 2019); 47 U.S.C. § 309(b). The first business day after the expiration of the 30-day public notice period is Monday, April 8, 2019.