

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

In the Matter of

Application of Speedcast Communications) Call Sign: N/A
Inc. for 30-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 30-day special temporary authorization (“STA”), commencing as soon as possible, but no later than Friday, August 30, 2019, to operate a previously licensed earth station onboard vessel (“ESV”) terminal – the 2.4m Intellian V240MT² – on a stationary drillship docked at a port in Mobile, Alabama (the “Port of Mobile”).³ Speedcast seeks to operate the V240MT terminal on the drillship, called the Noble Don Taylor, with the Galaxy 12 satellite located at the 129° W.L. orbital location in the 5925.0-5989.5 MHz (Earth-to-space), 6167.75-6241.54 MHz (Earth-to-space), 6271.54-6330.49 MHz (Earth-to-space) and 6360.49-6389.79 (Earth-to-space) MHz bands for transmit-only operations to support onboard personnel while the vessel is temporary docked in the Port of Mobile.

Grant of this STA will serve the public interest because it will enable Speedcast to continue providing critical broadband connectivity for crew and other employees living aboard the drillship

¹ 47 C.F.R. § 25.120.

² See Speedcast Communications Inc., File No. SES-MOD-20151210-00928, Call Sign E090176 (“*ESV Blanket License*”). The V240MT is a technically identical, 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 C-band frequencies only.

³ Geographic coordinates: 30° 40’ 44.2” N, 88° 01’ 55.7” W.

and ensure no lapse in services while the vessel is temporarily stationed at the port. Given the short duration that the Noble Don Taylor will be docked at the Port of Mobile (less than 2 months), Speedcast does not currently need, nor anticipate the need for, long-term authority to operate the ESV terminal location.⁴ Once the drillship departs the Port of Mobile, Speedcast will resume supporting the vessel under the *ESV Blanket License*. During the STA term, the drillship will remain docked at all times and operation of the V240MT will be fully consistent with the Commission's spectrum management policies, including two-degree satellite spacing, to ensure operations do not adversely affect other spectrum users. In the draft FCC Form 312 Schedule B and Technical Appendix, Speedcast provides relevant information relating to the proposed operations, including the C-band transmit frequencies and power levels, a radiation hazard analysis⁵ and the coordination notice.

I. Discussion

In the *ESV Blanket License*, Speedcast has authority to operate the previously licensed V240MT terminal with any U.S.-licensed or non-U.S. licensed satellite on the Commission's C-band Permitted Space Station List ("Permitted List") at higher power levels than those proposed in this STA. However, Speedcast acknowledges that the V240MT authorization in the *ESV Blanket License* is for mobile ESV terminals (*i.e.*, operating on vessels in motion beyond 200 km from the U.S. shoreline). In the event Speedcast seeks regular authority to operate at the Port of Mobile, it will file the required a C-band Notification pursuant to Section 25.221(a)(12) of the

⁴ Because Speedcast does not anticipate filing an application for long-term authority, a 60-day STA is also not appropriate. *See* 47 C.F.R. § 25.120(b)(3). Speedcast reserves the right to renew this 30-day STA for an additional term to ensure valid operating authority while the drillship is docked at the port.

⁵ The V240MT radiation hazard study was conducted using worst-case scenario power levels and, in reality, Speedcast will operate the antenna at a significantly lower input power (*see* draft FCC Form 312 Schedule B).

Commission's rules.⁶ Nonetheless, Speedcast has engaged Micronet Communications Inc. ("Micronet") to complete coordination with all potentially affected U.S.-licensed fixed service operators onshore near the Port of Mobile.

A. Frequency Coordination

Pursuant to Sections 25.115(c)(2)(ii) and 25.203 of the Commission's rules, 47 C.F.R. §§ 25.115(c)(2)(ii) and 25.203, Micronet has conducted a coordination analysis on behalf of Speedcast and issued Prior Coordination Notices ("PCNs") that considers all existing, proposed and prior coordinated microwave facilities within the contours of the ESV terminal at the Port of Mobile. As demonstrated in the attached data sheet,⁷ the proposed operations have been coordinated and limited as necessary and there is no potential for interference into other users of the C-band spectrum sought herein by Speedcast, and V240MT transmission are fully compatible with other FCC-licensed operations in the band.

Although the PCN period does not end until September 4, 2019, Speedcast files this STA with the associated data sheet in order to help streamline the Commission's review and application processing. All potential interference cases that were identified by current licensees have been fully accounted for, and Speedcast has significantly limited its operations to ensure no interference

⁶ See 47 C.F.R. § 25.221; Public Notice DA 05-1671 (Rel. June 15, 2005)

⁷ The V240MT was coordinated using worst-case scenario power levels, and in reality, Speedcast will operate the terminal at a significantly lower input power (see draft FCC Form 312 Schedule B). Moreover, the data sheet assumes an antenna centerline height of 44.65 meters, which reflects the mounting height of the terminal on the drillship. Because the antenna is not installed onshore, the above mean sea level ("AMSL") is technically 0 meters above "ground" level. Practically, however, 44.65 meters is the AMSL height and was used to assess this interference analysis.

into terrestrial operators.⁸ Micronet has concluded that each site will operate satisfactorily with the common carrier microwave environment and anticipate no objections during the PCN period. Speedcast will update the Commission (and this application docket) immediately upon receipt of the final coordination report. Of course, if Speedcast learns of any interference issues at the end of the PCN period, it will immediately cease or modify its operations accordingly to prevent such interference.

B. 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 30-day STA request so that the Commission may permit operations by August 30, 2019. Moreover, Section 25.120(b)(4) states that the Commission may grant a temporary authorization for up to 30 days if the STA request has not been placed on public notice and the applicant does not plan to file a request for regular authority for the service. Speedcast seeks this STA to support the Noble Don Taylor drillship while it is temporarily docked at the port and it does not intend to file an application for long-term authority for the operations proposed hereunder. Once the vessel departs the Port of Mobile, Speedcast will resume supporting onboard operations under its *ESV Blanket License*.

Grant of this 30-day STA will strongly serve the public interest by allowing Speedcast to provide uninterrupted connectivity for personnel working and living onboard the vessel. Specifically, the terminal will be mounted atop the living quarters on the Noble Don Taylor and provide a means of reliable broadband communications for the crew that otherwise may not be

⁸ When transmitting from the Port of Mobile, Speedcast will limit its operations to the 5925.0-5989.5 MHz (Earth-to-space), 6167.75-6241.54 MHz (Earth-to-space), 6271.54-6330.49 MHz (Earth-to-space) and 6360.49-6389.79 MHz (Earth-to-space) bands.

able to access terrestrial connectivity from offshore. More generally, this STA will help Speedcast demonstrate its operational flexibility to U.S. and international customers, helping to further establish U.S. leadership in maritime satellite connectivity.

II. Conclusion

Based on the foregoing, the public interest would be served by a grant of Commission authority as soon as possible, but no later than Friday, August 30, 2019, to Speedcast to operate the V240MT terminal with Galaxy 12 in the C-band to support the Noble Don Taylor drillship while docked at the Port of Mobile.