REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 25.120 of the Commission's rules,¹ Telesat Network Services, Inc. ("TNSI") hereby requests an extension of its special temporary authority ("STA") to operate a Ka-band antenna in Port St. Lucie, Florida for a period of thirty (30) days, commencing on January 1, 2020, the day the original STA is set to expire.² The Ka-band antenna is being used on a temporary basis to provide testing support for TNSI's Ka-band earth station in Middletown, Virginia (the "Middletown gateway"),³ which recently commenced operation and which serves as a backup gateway for the Telstar 19 VANTAGE satellite ("T19V").⁴

TNSI's original STA request contemplated completion of testing in one day.⁵ Based on testing that was conducted under the STA, however, it has been determined additional testing is necessary that cannot be concluded within the existing time-frame. TNSI instead must schedule further testing in January 2020.

All parameters and technical characteristics remain unchanged and all showings contained in the original STA request are hereby incorporated by reference. TNSI will continue to coordinate its STA operations with the U.S. federal government under footnote US334 of the United States Table of Frequency Allocations.⁶

The Middletown gateway supports high capacity links to customers in the Caribbean, and a back-up gateway facility is a diversity requirement of these customers.

² See Telesat Network Services, Inc. Application for STA to Operate an Earth Station at Port St. Lucie, FL to provide testing support for the T19V Ka-band gateway earth station, FCC File No. SES-STA-20191031-01398, granted Nov 26, 2019.

¹ 47 C.F.R §25.120

³ See Telesat Network Services, Inc., FCC Callsign E160134. See also Telesat Network Services, Inc., Application to Further Extend Construction Deadline of Transmit/Receive Earth Station in Middletown, VA, FCC Callsign E160134, IBFS File No. SES-MOD-20191015-01323.

⁴ The licensee for T19V is Telesat International Limited, a commonly controlled affiliate of TNSI.

⁵ Original STA Narrative at n. 3.

⁶ TNSI answered "no" to question E18 in the Schedule B it submitted with it original STA Request, thereby indicating that frequency coordination is not required, based on its understanding that the question is limited to non-federal government coordination requirements, if any.

Grant of TNSI's STA request is in the public interest because it will facilitate testing that is needed in connection with these operations.

Accordingly, and for good cause shown, TNSI requests that the Commission grant its STA extension request.