Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Application of Speedcast Communications Inc. (as Debtor-in-Possession) for 60-day Special Temporary Authorization ("STA")	)))	Call Sign: E050018 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. (as Debtor-in-Possession) ("Speedcast") respectfully seeks an extension of its 60-day special temporary authorization ("STA"),[2] commencing on Monday, May 11, 2020 or as soon as practicable thereafter, to operate two (2) earth stations at its Miami teleport during the pendency of its underlying long-term application for the identical operations.[3] Specifically, Speedcast seeks continued temporary authority to operate a 2.4m Prodelin Model 1251 for transmit-only operations in the 5.925-6.425 GHz band to support communications in remote areas of Alaska, and a 13m Vertex Model K13K for operations in the 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) bands to support maritime and other customer communications. Pursuant to Commission rules and precedent, Speedcast understands that this timely filed extension request will effectively extend its current temporary authority until the Commission acts on the instant request.[4]

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[1] 47 C.F.R. § 25.120.

[2] *See* Speedcast Communications Inc., File No. SES-STA-20200302-00211.

[3] *See* Speedcast Communications Inc., File No. SES-MOD-20190225-00190, Call Sign E050018 ("*Miami Teleport Application*").

[4] *See* 47 C.F.R. § 25.162; *see also* Administrative Procedure Act § 9(b).

Extension of the STA will serve the public interest because it will enable Speedcast to continue providing reliable satellite connectivity backup to accommodate broadband service interruptions affecting customers that are unable to rely on traditional terrestrial infrastructure for basic communications. Access to improved, satellite-based capacity resources is particularly important given recent emergency situations related to the COVID-19 pandemic.

I. Discussion

This STA seeks continued authority to operate two earth stations at Speedcast's existing Miami teleport. First, the 2.4m Prodelin is on the Commission's Non-Routine Antenna List and has been previously approved to operate in the 5.925-6.425 GHz band at higher EIRP spectral density levels than those sought herein.[5] Although the 2.4m Prodelin does not comply with the gain mask in Section 25.209 of the Commission's rules, as a means to mitigate the potential for increased interference, Speedcast will operate the earth station at EIRP and EIRP spectral density levels below those currently authorized in the subject license and in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules.[6] The 2.4m Prodelin will communicate with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position.

Second, Speedcast seeks to operate the 13m Vertex in the 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) bands at EIRP spectral density levels well below those currently authorized for Ku-band operations under Call Sign E050018, at all times in compliance with the relevant EIRP spectral density mask in Section 25.218(f) of the Commission's rules.[7] The 13m Vertex will communicate with INTELSAT-904 satellite located at 29.5° W.L.

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[5] *See* Approved Non-Routine Earth Station Antennas, https://www.fcc.gov/approved-non-routine-earth-station-antennas; *e.g.,* Intelsat LLC, File No. SES-LIC-20080717-00949, Call Sign E080170.

[6] *See* 47 C.F.R. § 25.218(d).

[7] *See id.* at § 25.218(f).

Therefore, both the 2.4m Prodelin and 13m Vertex will operate in conformance with the routine uplink parameters specified in Section 25.218 of the Commission's rules. As demonstrated in the attached Technical Appendix, operation of the earth stations will be fully consistent with the Commission's spectrum management policies, including two-degree satellite spacing, and will not adversely affect the operations of other spectrum users. Speedcast reattaches the FCC Form 312 Schedule B and Technical Appendix for relevant information relating to the proposed operations, including frequencies and power levels, a radiation hazard analysis, and a coordination report.[8]

a. Frequency Coordination

Speedcast engaged Comsearch to perform frequency coordination analysis for the 2.4m Prodelin, which was completed on February 14, 2020. 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, Comsearch has conducted an analysis on behalf of Speedcast that considers existing, proposed, and prior-coordinated microwave facilities within the contours of the 2.4m Prodelin at the Miami teleport.

As demonstrated in the attached frequency coordination report, as coordinated and limited,[9] there is no potential for interference between other users of the C-band spectrum and the operations of the 2.4m Prodelin at the Miami facility, and Speedcast's proposed operations are fully compatible with other FCC-licensed operations in the band. All potential interference cases that were identified have been resolved through operational limitations, and Comsearch has concluded that the site will operate satisfactorily with the common carrier microwave environment. Speedcast will coordinate any additional operations prior to bringing them into operation.

[8] Speedcast notes that the frequency coordination report for the 2.4m Prodelin was prepared using worst-case scenario power levels and, in reality, Speedcast will operate the antenna at a much lower EIRP spectral density level (*see* Form 312 Schedule B).

[9] As demonstrated in the frequency coordination report and Form 312 Schedule B, Speedcast will limit is operations to certain segments of the 5.925-6.425 GHz band to eliminate the potential for interference into authorized co-frequency operations.

II. 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 60-day STA request so that the Commission may permit operations by May 11, 2020. Moreover, Section 25.120(b)(2) states that the Commission may grant a temporary authorization for up to 60 days if the STA request has not been placed on public notice and the applicant plans to file a request for regular authority for the service. As noted, the *Miami Teleport Application* requesting the identical operating authority is on file with the Commission and this STA will ensure Speedcast has appropriate authority during the Commission's review of the long-term request.

Grant of extension will strongly serve the public interest by allowing Speedcast to accommodate any unexpected service interruption to the remote Alaskan communities, the maritime sector, and other customers that rely on its broadband services for basic connectivity needs. More generally, this STA will help to bridge the digital divide by giving businesses and consumers access to more reliable broadband connectivity.

III. Conclusion

Based on the foregoing, the public interest would be served by a grant of Commission authority to Speedcast to continue to operate the 2.4m Prodelin and 13m Vertex for 60 days, commencing on Thursday May 11, 2020, or as soon as possible thereafter.