

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

In the Matter of

Application of Speedcast Communications )  
Inc. for 60-day Special Temporary ) File No. SES-STA-\_\_\_\_\_  
Authorization (“STA”) )

**APPLICATION FOR SPECIAL TEMPORARY AUTHORIZATION**

Pursuant to Section 25.120 of the rules of the Federal Communications Commission (the “FCC” or “Commission”),<sup>1</sup> Speedcast Communications Inc. (“Speedcast”) respectfully seeks 60-day special temporary authorization (“STA”), commencing on Friday, June 4, 2021, or as soon as practicable thereafter, to operate a 2.4m earth station in the 6227-6263 MHz and 6307-6343 MHz (Earth-to-space) and 4002-4038 MHz and 4082-4118 MHz bands (space-to-Earth) bands with the Eutelsat 113WA satellite located at the 113° W.L. orbital location. The 2.4m earth station (AvL Technologies Model 2410) will provide critical emergency communications restoration services in Puerto Rico if severe weather events adversely affect existing communications infrastructure.

Grant of this STA will serve the public interest because it will enable Speedcast to immediately deliver critical emergency restoration services in the event of a weather or other natural disaster, which is particularly important given the risk of communications outages during hurricane season and the increased reliance on communications connectivity as Puerto Rico continues to address the impacts of the COVID-19 pandemic. The 2.4m earth station will serve as a backup backhaul link for terrestrial cellular operators during disaster recovery activities to ensure vital communications services can be provided for residents, emergency personnel, government agencies, and businesses.

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<sup>1</sup> 47 C.F.R. § 25.120. Speedcast will file an application for regular earth station license authority after it has fully addressed coordination issues, so the requested STA can be granted for a period of 60 days.

## I. Discussion

During emergency service restoration operations only, the 2.4m earth station will communicate with the U.S.-licensed Eutelsat 113WA in the 6227-6263 MHz and 6307-6343 MHz (Earth-to-space) and 4002-4038 MHz and 4082-4118 MHz bands (space-to-Earth) bands to ensure uninterrupted communications connectivity after a severe weather event. Speedcast will operate the 2.4m earth station at off-axis EIRP spectral density (“ESD”) levels in compliance with the mask in Section 25.218(c) of the Commission’s rules<sup>2</sup> to ensure no harmful interference into other authorized. In addition, Speedcast has engaged Micronet Communications Inc. (“Micronet”) to ensure that operations under the requested STA will not cause interference to U.S.-licensed fixed service operators and to facilitate coordination of Speedcast’s long-term operations with all potentially affected in the 2.4m earth station’s transmit bands.

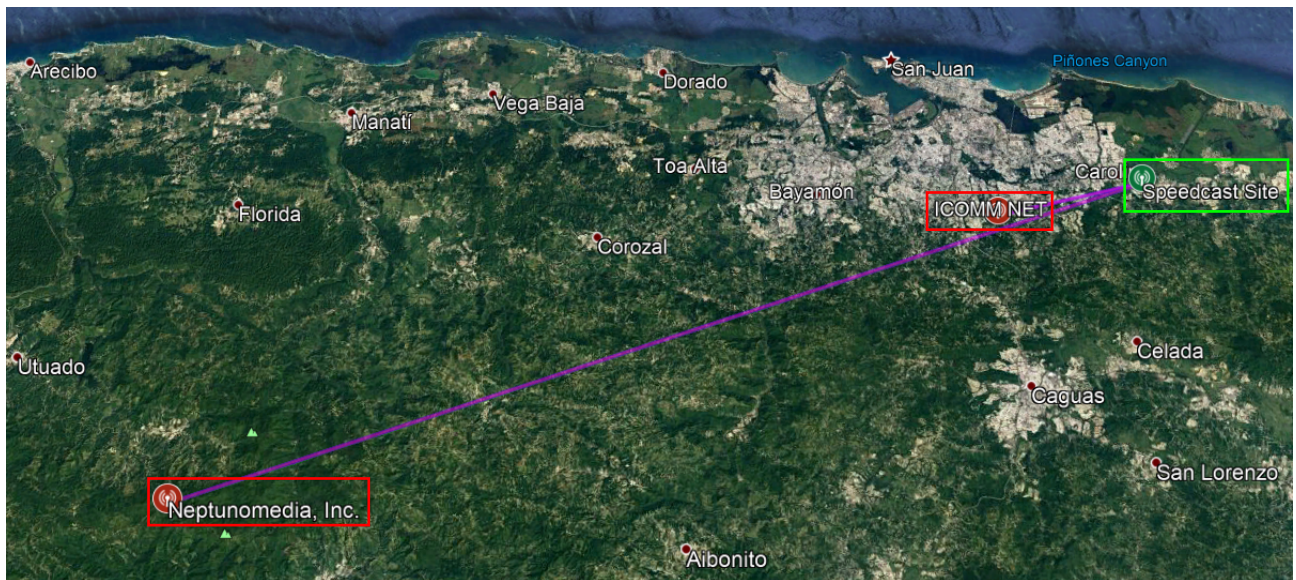
Speedcast provides the attached Technical Appendix for relevant information relating to the proposed operations, including a draft FCC Form 312 Schedule B, and a frequency coordination data sheet that identifies certain terrestrial microwave stations for which Speedcast must either reduce its maximum proposed transmit power, mitigate ESD toward the terrestrial stations using radiofrequency (“RF”) fencing/screening, or otherwise coordinate the higher-power operations.<sup>3</sup> As discussed below, Speedcast commits to operating at reduced power sufficient to avoid interference until such time as it installs RF fencing/screening or concludes coordination

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<sup>2</sup> See 47 C.F.R. § 25.218(c).

<sup>3</sup> The 2.4m earth station will be mounted in an area on the rooftop that is inaccessible to the general public. Speedcast will comply with the Maximum Permissible Exposure (“MPE”) limits for Occupational/Controlled environments, as described in the FCC Office of Engineering and Technology Bulletin, No. 65, by ensuring operational personnel do not have access to the areas that exceed the MPE levels while the earth station is in operation. Only trained personnel will have access to the earth station, and the earth station transmitters will be turned off during antenna maintenance to ensure that no individuals are exposed to harmful levels of radiation.

with affected terrestrial licensees to permit operation at the maximum power level. 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 of Speedcast’s proposed operations at the relevant site (highlighted below in green). Micronet has identified two sites of potential interference at maximum transmit power: Neptunomedia, Inc. (Call Sign WQEQ866, 5.6 dB exceedance) and ICOMM NET (Call Sign WRCZ226, 4.7 dB exceedance) (highlighted below in red).



These potential interference cases will be fully taken into account. Specifically, Speedcast certifies it will operate sufficiently reduced power level than that requested to clear all interference cases (*i.e.*, at the maximum reduction of 5.6 dB) until it installs appropriate RF screening or otherwise coordinates the higher-power operations. Speedcast also again notes that its proposed operations will only be during intermittent and temporary disaster recovery activities.

Speedcast intends to submit a complete coordination report to the Commission along with its earth station license application. Of course, if Speedcast learns of any interference issues during

the term of the requested STA, it will immediately cease or modify its operations accordingly to prevent such interference.

## **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 commencement of proposed operations. Here, Speedcast has timely filed this STA request so that the Commission may permit operations by Friday, June 4, 2021. 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. Speedcast plans to file an application shortly after submission of this STA request to permit regular operation of the antenna.

In Puerto Rico, hurricane season is beginning and, having been the victim of severe weather incidents many times in recent years, is especially in need of this backup backhaul link. After Hurricane Maria in 2017, for example, approximately 95% of Puerto Rico's terrestrial cellular sites were out of service. Because terrestrial wireless companies often rely on satellite services for backup and emergency restoration services and continuing efforts to address the impacts of the COVID-19 pandemic, grant of this 60-day STA will strongly serve the public interest by allowing Speedcast to immediately implement the 2.4m earth station so it is ready to be used in the event of additional severe weather events. The residents and business of Puerto Rico will directly benefit from the operations of the Speedcast site during the term of this STA and eventual full earth station authorization.

Moreover, this STA will allow Speedcast to provide more efficient and flexible services in the United States and promote next-generation commercial deployments. In addition, operation of the antenna will be fully consistent with the Commission's spectrum management and ESV policies, including two-degree satellite spacing, and will not adversely affect the operations of

other spectrum users. Finally, as noted above, grant of this STA will allow Speedcast to deploy the 2.4m earth station during the pendency of its forthcoming filed application for earth station license authority to use the 2.4m earth station for emergency restoration services.

### **III. Conclusion**

Based on the foregoing, the public interest would be served by a grant of Commission authority to Speedcast to operate the 2.4m earth station with the Eutelsat 113 WA satellite in the 6227-6263 MHz and 6307-6343 MHz (Earth-to-space) and 4002-4038 MHz and 4082-4118 MHz bands (space-to-Earth) bands to provide emergency restoration services in Puerto Rico.