

REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 25.120 of the Commission's rules and out of an abundance of caution,¹ the American Samoa Telecommunications Authority ("ASTCA") requests an extension of its special temporary authorizations ("STAs") for an additional 180 days to operate a temporary fixed satellite service ("FSS") VSAT network system in the 19.8-19.95 GHz and 29.6-29.7 GHz bands at the following locations in the Manu'a islands:

Requested Locations for VSATs ²		
Location	Latitude	Longitude
Ofu	14° 10' 32.72" S	169° 37' 30.23" W
Ta'u	14° 13' 24.88" S	169° 30' 40.69" W

Operations would continue pursuant to the technical parameters of ASTCA's previously granted STAs.³ Therefore, antenna information would include the following, which applies to both locations:

Antenna Information ⁴	
VSAT	Newtec ANT2035
Transmit Power	3W
EIRP	49.4 dBW (linear)
Emission Designator	257KG7W

Similarly, the VSATs will continue communicating with the Kacific 1 space station. While Kacific 1 is not yet on the Commission's approved space station list, a 180-day extension of special temporary authority to communicate with Kacific 1 would serve the public interest because: (1) Kacific 1 currently seeks U.S. market access;⁵ (2) Kacific 1 is licensed by Japan, which is a well-respected member of the International Telecommunication Union;⁶ and (3) Kacific 1 launched from Cape Canaveral, FL, in December 2019 on SpaceX's Falcon 9,⁷ which underwent safety, policy, and

¹ See 47 C.F.R. § 25.120. ASTCA notes that IBFS no longer shows the original STAs were granted. Therefore, ASTCA is requesting an extension of the original STAs out of an abundance of caution and has attached the previous grants to this application. See Appendix A.

² ASTCA clarifies that it has filed separate requests for the Ofu and Ta'u locations but formatted this narrative to cover both requests. Both locations are therefore listed in this narrative.

³ See Appendix A (showing grants for IBFS File Nos. SES-STA-20210719-01076 and SES-STA-20210719-01077 commence Nov. 19, 2021).

⁴ See Letter from John W. Castle, Counsel to ASTCA, to Marlene H. Dortch, Secretary, FCC, IBFS File Nos. SES-STA-20210719-01076 and SES-STA-20210719-01077, at 1 (Aug. 24, 2021).

⁵ See Application of Kacific Broadband Satellites International Ltd. for U.S. Market Access, IBFS File No. SES-LFS-20210521-00824 (filed May 21, 2021).

⁶ See *id.*, Narrative at 2 ("The Kacific-1 satellite is licensed by Japan.").

⁷ See Rachel Jewett, *Via Satellite*, "SpaceX Launch Delivers Payloads for Sky Perfect JSAT, Kacific," <https://bit.ly/3AUZOsp> (Dec. 17, 2019).

payload reviews to obtain its commercial space transportation license from the Federal Aviation Administration.⁸

The Commission may grant an STA upon a finding that: (1) extraordinary circumstances require temporary operations in the public interest, and (2) delay in the institution of these temporary operations would seriously prejudice the public interest.⁹ Such circumstances exist here. The distance between the Manu'a islands and ASTCA's facilities in Tutuila prevents ASTCA from installing a temporary terrestrial network. ASTCA has been unable to repair the affected submarine cable. Therefore, extraordinary circumstances require temporary operations so that ASTCA may continue providing service to the Manu'a islands' roughly 1,400 residents.¹⁰ Specifically, the requested extension will serve the public interest by allowing ASTCA to provide residents basic communications services, including those for safety of life and emergency purposes, while ASTCA continues to attempt to repair the submarine cable and restore normal service.

Waiver Request. To the extent necessary, ASTCA also requests waiver of Section 25.120(a)'s requirement that an extension be filed "3 working days prior to . . . the expiration date of the existing temporary authorization."¹¹ The Commission has authority to waive this timing requirement for good cause shown.¹² If necessary, good cause exists to grant waiver of the timing requirement so that the Manu'a islands' approximately 1,400 residents can continue to receive basic communication services, including those for safety of life and emergency services, without disruption while ASTCA attempts to repair the broken submarine cable.

⁸ See Commercial Space Transportation License No. LLO 19-110 (Rev 2), <https://bit.ly/3hxd7aS> (eff. Nov. 8, 2019) (authorizing Space Exploration Technologies to conduct "[f]lights of Falcon 9 . . . from Launch Complex 39A at Kennedy Space Center . . . [to] transport[] a payload to a low Earth or geosynchronous transfer orbit"); see also FAA, *Getting Started with Licensing*, "Commercial Space Transportation Process – Site/Vehicle Operator License," <https://bit.ly/3yV5JMX> (May 3, 2021) (outlining the space transportation licensing process, including safety, policy, and payload reviews).

⁹ 47 C.F.R. § 25.120(b)(1).

¹⁰ See *id.*

¹¹ 47 C.F.R. § 25.120(a).

¹² 47 C.F.R. § 1.3.

APPENDIX A

Applicant: American Samoa Telecommunications Authority
File Number: SES-STA-20210719-01076
Call Sign: No Call Sign
Special Temporary Authority ("STA")

American Samoa Telecommunications Authority ("ASTCA") is granted a 30-day STA, commencing November 19, 2021, for its existing VSAT network system to communicate with the Japanese administration geosynchronous orbit ("GSO") Kacific satellite at the 150°E orbital location in the frequency bands 29600-29700 MHz (Earth-to-space) and 19800-19950 MHz (space-to-Earth) located at geographic coordinates 14° 13' 24.88"S/169° 30' 40.69"W in Ta'u, Manu'a Islands, AS due to complete service outage caused by broken marine fiber. Operations shall be conducted under the following conditions:

- 1) Input power at antenna flange of 3 W, eirp of 49.4 dBW using antenna model NEWTEC ANT 2035 with emission designator 257KG7W.
- 2) Operations shall comply pursuant to 47 C.F.R. § 25.218(i).
- 3) Temporary operations shall be on center frequencies within frequency bands 29600-29700 MHz (Earth-to-space) and 19800-19950 MHz (space-to-Earth) that are authorized by the authorization of the requested space station.
- 4) Operations, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference.
- 5) In the event of any harmful interference under this grant of STA, ASTCA must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
- 6) Transmitter(s) must be turned off during antenna maintenance to ensure compliance with the FCC-specified safety guidelines for human exposure to radiofrequency radiation in the region between the antenna feed and the reflector.
- 7) The licensee shall take all necessary measures to ensure that antenna in operation does not create potential exposure of humans to radiofrequency radiation in excess of the FCC exposure limits defined in 47 CFR 1.1307(b) and 1.1310 wherever such exposures might occur. Measures must be taken to ensure compliance with limits for both occupational/controlled exposure and for general population/ uncontrolled exposure, as defined in these rule sections. Compliance can be accomplished in most cases by appropriate restrictions such as fencing. Requirements for restrictions can be determined by predictions based on calculations, modeling or by field measurements. The FCC's OET Bulletin 65 (available on-line at www.fcc.gov/oet/rfsafety) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alert signs and protective equipment for workers.

- 8) Grant of this authorization is without prejudice to any determination that the Commission may make regarding any of ASTCA's pending application or future applications.
- 9) Any action taken or expense incurred as a result of operations pursuant to this STA is solely at ASTCA's risk.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective upon release.

Applicant: American Samoa Telecommunications Authority
File Number: SES-STA-20210719-01077
Call Sign: No Call Sign
Special Temporary Authority ("STA")

American Samoa Telecommunications Authority ("ASTCA") is granted a 30-day Special Temporary Authority (STA), commencing November 19, 2021, for its existing VSAT network system to communicate with the Japanese administration geosynchronous orbit ("GSO") Kacific satellite at the 150°E orbital location in the frequency bands 29600-29700 MHz (Earth-to-space) and 19800-19950 MHz (space-to-Earth) located at geographic coordinates 14° 10' 32.72"S/169° 37' 30.23"W in Ofu, AS due to complete service outage caused by broken marine fiber.

Operations shall be conducted under the following conditions:

- 1) Input power at antenna flange of 3 W, eirp of 49.4 dBW using antenna model NEWTEC ANT 2035 with emission designator 257KG7W.
- 2) Operations shall comply pursuant to 47 C.F.R. § 25.218(i).
- 3) Temporary operations shall be on center frequencies within frequency bands 29600-29700 MHz (Earth-to-space) and 19800-19950 MHz (space-to-Earth) that are authorized by the authorization of the requested space station.
- 4) Operations, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference.
- 5) In the event of any harmful interference under this grant of STA, ASTCA must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
- 6) Transmitter(s) must be turned off during antenna maintenance to ensure compliance with the FCC-specified safety guidelines for human exposure to radiofrequency radiation in the region between the antenna feed and the reflector.
- 7) The licensee shall take all necessary measures to ensure that antenna in operation does not create potential exposure of humans to radiofrequency radiation in excess of the FCC exposure limits defined in 47 CFR 1.1307(b) and 1.1310 wherever such exposures might occur. Measures must be taken to ensure compliance with limits for both occupational/controlled exposure and for general population/ uncontrolled exposure, as defined in these rule sections. Compliance can be accomplished in most cases by appropriate restrictions such as fencing. Requirements for restrictions can be determined by predictions based on calculations, modeling or by field measurements. The FCC's OET Bulletin 65 (available on-line at www.fcc.gov/oet/rfsafety) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alert signs and protective equipment for workers.

- 8) Grant of this authorization is without prejudice to any determination that the Commission may make regarding any of ASTCA's pending application or future applications.
- 9) Any action taken or expense incurred as a result of operations pursuant to this STA is solely at ASTCA's risk.

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