

June 2, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Request for Experimental Radio Station License;
Experimental Licensing System File No. 0423-EX-CN-2017
EXPEDITED TREATMENT REQUESTED UNDER SEPARATE LETTER

Dear Ms. Dortch:

Pursuant to Section 5.3(e) and (f) of the Federal Communications Commission's ("FCC" or "Commission") Rules, 47 C.F.R. § 5.3(e),(f) (2015), Intelsat License LLC ("Intelsat") herein requests an Experimental Radio Station License¹ for one year to evaluate and demonstrate static and land-mobile performance and acceptability of a sub-one meter mobile Ku-band satellite terminal that will communicate with the Intelsat 29e satellite (Call Sign 2913),² SKY-B1 satellite (Call Sign S2922),³ and Galaxy 19 satellite (Call Sign 2647).⁴

Intelsat does not propose to market devices under the requested experimental license, and any devices will be labelled in accordance with Section 2.803 of the FCC's rules that "This device has not been authorized as required by the rules of the Federal Communications Commission. This device is not, and may not be, offered for sale or lease, or sold or leased, until authorization is obtained."

Intelsat is seeking to evaluate and demonstrate Ku-band mobile connectivity and functionality using a GetSAT MicroSat Ku-band antenna. The tests involve temporary operations in the 14.2 – 14.47 GHz (transmit) and 10.7 – 12.2 GHz (receive) frequency bands in which Intelsat is currently authorized to operate. Intelsat proposes to conduct tests and evaluations while the terminal is at a static location, as

¹ Intelsat has filed its experimental license application on FCC Form 442, a \$70.00 filing fee, and supporting materials electronically via the OET Experimental Licensing System ("OET") under File No 0423-EX-CN-2017.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-01212, File No. SAT-MOD-20160916-00091 (Jan. 27, 2017) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01237, File No. SAT-MOD-20170221-00019 (May 12, 2017) (Public Notice).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00406, File No. SAT-RPL-20041015-00201 (Dec. 8, 2006) (Public Notice).

well as in-motion while the terminal is vehicle-mounted. Specifically, Intelsat seeks to conduct tests and demonstrations at the following locations:

Fixed Locations:

17625 Technology Blvd.
Hagerstown, MD 21740
Latitude (NAD 83): 39° 35' 54.9" N
Longitude (NAD 83): 77° 45' 10.6" W

11717 Exploration Ln.
Germantown, MD 20876
Latitude (NAD 83): 39°10'44.1"N
Longitude (NAD 83): 77°14'48.6"W

Mobile Locations:

State of Maryland
Commonwealth of Virginia
State of North Carolina
State of Florida
State of Nevada

In addition, testing under this experimental license will be under human supervision to ensure safety and compliance with the terms of the license. In particular, no antenna will be mounted in a fashion that will require approval under Federal Aviation Administration and FCC rules and regulations, and all operations will comply with the limits set forth in the FCC's rules relating to human exposure to radiation.

To minimize any potential interference, operations under this experimental license will be in conformance with the Commissions Part 25 Vehicle-Mounted Earth Stations ("VMES") rules. In the extremely unlikely event that harmful interference should occur due to transmissions to or from the antenna, Intelsat will take all reasonable steps to eliminate the interference. The following contact information is provided for purposes of addressing any interference issues that might arise and to terminate the operations, if needed:

Primary Contact:

ISOC – Intelsat General Secure
Operating Center (24x7 operations)
+1 (800) 814-7717
+1 (404) 381-2727
Intelsat General Corporation
2875 Fork Creek Church Rd
Ellenwood, GA 30294

Secondary Contacts:

Joseph Gorzelnik
joseph.gorzelnik@intelsatgeneral.com
Cell: +1-202-438-4402

Timothy O'Boyle
timothy.oboyle@intelsatgeneral.com
Cell: +1-703-270-4765
Intelsat General Corporation
7900 Tysons One Place, Suite 12
McLean, VA 22102

Intelsat herein attaches explanatory Exhibit A, in further response of a Form 442 question.

Grant of this experimental license will allow Intelsat to verify and demonstrate the static and land-mobile performance of a sub-one meter mobile Ku-band satellite terminal. This, in turn, will help determine its readiness for commercial operation and thereby serves the public interest.

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June 2, 2017

Page 3

Please direct any questions regarding this request to the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

EXHIBIT A

Explanation for Response to Question on Form 442: License Denied or Revoked

Intelsat License LLC has answered “No” to the question on Form 442 which asks “Has applicant or any party to this application had any FCC station license or permit revoked or any application for permit, license or renewal denied by this Commission?” Intelsat has never had an FCC license “revoked.” However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to PanAmSat Licensee Corp. (“PanAmSat”), a former sister company of Intelsat, based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones. *See PanAmSat Licensee Corp., Memorandum Opinion and Order, DA 00-1266, 15 FCC Rcd 18720 (IB 2000).* In that same order, the Bureau denied related applications to modify the cancelled authorizations. PanAmSat filed an application for review of the Bureau’s decision, which the Commission denied, and subsequently filed an appeal with the United States Court of Appeals for the District of Columbia Circuit, which was dismissed January 2003 at PanAmSat’s request. Notwithstanding the fact that the Bureau’s action does not seem to be the kind of revocation action contemplated by the question, Intelsat is herein making note of the decision in the interest of absolute candor and out of an abundance of caution. In any event, the Bureau’s action with respect to PanAmSat does not reflect on Intelsat’s basic qualifications, which are well established and a matter of public record.