

S2380 SAT-STA-20140421-00040 IB2014000787
Intelsat License LLC
Intelsat 9



→ with conditions

File # SAT-STA-20140421-00040

Call Sign S2380 Grant Date 04/24/14

(or other identifier)

Term Dates period of 60 days
From 04/25/14 To: 60 days

Approved: Stephen J. Duall

Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060-0678

Date & Time Filed: Apr 21 2014 11:47:59:186AM
File Number: SAT-STA-20140421-00040
Callsign:

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for Further Extension of Special Temporary Authority to Drift and Operate Intelsat 9 (Call Sign S2380)

1. Applicant

Name:	Intelsat License LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall		

Intelsat License LLC
IBFS File No. SAT–STA–20140421-00040
Call Sign S2380

The application of Intelsat License LLC (Intelsat) for special temporary authority, IBFS File No. SAT–STA–20140421–00040, IS GRANTED. Specifically, Intelsat is authorized, for a period of 60 days, commencing on April 25, 2014, to conduct telemetry, tracking, and command functions necessary to maintain the Intelsat 9 space station (Call Sign S2380) at the 43.10° W.L. orbital location in the 11.7005 GHz (space-to-Earth), 11.7025 GHz (space- to-Earth), 14.4945 GHz (Earth-to-space), and 14.0005 GHz (Earth-to-space) frequency bands. Intelsat is also authorized to operate Intelsat 9 temporarily at the 43.10° W.L. orbital location to provide Fixed-Satellite Service (FSS) in the 3700-4200 MHz (space-to-Earth), 5925-6425 MHz (Earth-to-space), 11.45-11.7 GHz (space-to-Earth), 11.7-12.2 GHz (space-to-Earth), and 14.0-14.5 GHz (Earth-to-space) frequency bands. Operations under this authorization must be in accordance with the terms and conditions contained in Intelsat’s application and the Federal Communications Commission’s rules not waived herein, and are subject to the following conditions:

1. All operations under this grant of special temporary authority must be on an unprotected and non-harmful interference basis, *i.e.*, Intelsat must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating radiocommunication system.

2. In the event of any harmful interference as a result of the operations under this grant of special temporary authority, Intelsat must cease operations immediately upon notification of such interference and must immediately inform the Commission, in writing, of such an event.

3. Intelsat must maintain its space station within an east-west longitudinal station-keeping tolerance of $\pm 0.05^\circ$ of the 43.10° W.L. orbital location.

4. Grant of this authorization is without prejudice to any determination that the Commission may make regarding Intelsat’s pending application for regular authority to operate Intelsat 9 at the 43.1° W.L. orbital location (IBFS File No. SAT-MOD-20120703-00110) or its pending application with respect to the 11.7-12.2 GHz, 12.5-12.7 GHz, and 14.0-14.5 GHz frequency bands at the 43.0° W.L. orbital location (IBFS File No. SAT-MS-20100102-00232).

5. Intelsat’s request for waiver of footnote NG 52 of Section 2.106¹ is GRANTED, as conditioned. Consistent with previous waivers granted to Intelsat 9,² we find that, with respect to the domestic use of the 11.45-11.7 GHz band, waiver of footnote NG52 of Section

¹ Intelsat requests a waiver of footnote NG104 to the United States Table of Frequency Allocations and footnote 2 to Section 25.202(a)(1), which limited FSS operations in the 11.45-11.7 GHz frequency band to international-only services. 47 C.F.R. § 2.106, NG104; and footnote 2 to Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1). The Commission renumbered footnote NG104 as new footnote NG52 and removed footnote 2 to Section 25.202(a)(1). *See Revisions to Parts 2 and 25 of the Commission’s Rules to Govern the Use of Earth Stations Aboard Aircraft Communicating with Fixed-Satellite Service Geostationary-Orbit Space Stations Operating in the 10.95-11.2 GHz, 11.45-11.7 GHz, 11.7-12.2 GHz and 14.0-14.5 GHz Frequency Bands*, Notice of Proposed Rulemaking and Report and Order, 27 FCC Red 16510, 16520-21 ¶ 21 (2012) (*ESAA Order*). As a result of this Commission action, Intelsat’s request for waiver of footnote 2 to Section 25.202(a)(1) is no longer necessary. Footnote NG52 retains the limitation of FSS operations in the 11.45-11.7 GHz band to international-only services, with an exception not relevant here.

² *PanAmSat Licensee Corp. Application for Authority to Use Extended Ku-Band Frequencies for Domestic Service*, Order and Authorization, 20 FCC Red 14642 (2005).

Intelsat License LLC
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2.106 would not undermine the rule's purpose because receive-only earth stations are not capable of causing interference into fixed stations operating in the same frequency band. Furthermore, Intelsat cannot claim protection from interference caused to it by fixed stations operating in the 11.45-11.7 GHz frequency band.

a. Intelsat is required to inform its customers, in writing, including end-users receiving service from resellers accessing capacity on the Intelsat 9 space station, that domestic service in the United States in the 11.45-11.70 GHz frequency band is being provided on an unprotected basis, and is therefore subject to interference from fixed stations authorized to operate in the 11.45-11.7 GHz frequency band.

b. Intelsat's use of the 11.45-11.7 GHz frequency band is subject to footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.

6. Any action taken or expense incurred as a result of operations pursuant to this grant of special temporary authority is at Intelsat's own risk.

7. 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 immediately.

 GRANTED * International Bureau *with conditions	File # <u>SAT-STA-20140421-00040</u>
	Call Sign <u>S2380</u> Grant Date <u>04/24/14</u> (or other identifier)
	Term Dates <u>period of</u> From <u>04/25/14</u> To: <u>60 days</u>
	Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

2. Contact	
Name: Susan H. Crandall	Phone Number: 202-944-7848
Company: Intelsat Corporation	Fax Number: 202-944-7870
Street: 3400 International Drive,	E-Mail: susan.crandall@intelsat.com
City: Washington	State: DC
Country: USA	Zipcode: 20008 -3006
Attention: Susan H. Crandall	Relationship: Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number SATMOD2012070300110 or Submission ID	
4a. Is a fee submitted with this application?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other (please explain):	
4b. Fee Classification CRY – Space Station (Geostationary)	
5. Type Request	
<input type="radio"/> Change Station Location <input checked="" type="radio"/> Extend Expiration Date <input type="radio"/> Other	
6. Temporary Orbit Location	7. Requested Extended Expiration Date 2014-04-24 00:00:00.0

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests an additional 60-day extension, commencing April 25, 2014, of the Special Temporary Authority previously granted Intelsat to drift Intelsat 9 (call sign S2380) from 58.0 W.L. to 43.10 W.L. and operate at 43.10 W.L. in inclined orbit mode.

9. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes. Yes No

10. Name of Person Signing
Susan H. Crandall

11. Title of Person Signing
Assoc. General Counsel, Intelsat Corporation

12. Please supply any need attachments.

Attachment 1: STA Request

Attachment 2:

Attachment 3:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

April 21, 2014

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



Re: Request for Further Extension of Special Temporary Authority
to Drift and Operate Intelsat 9 (Call Sign S2380)

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60-day extension, commencing April 25, 2014, of the Special Temporary Authority ("STA")¹ previously granted Intelsat to drift Intelsat 9 (call sign S2380) from 58.0° W.L. to 43.10° W.L. and operate at 43.10° W.L. in inclined orbit mode.²

Intelsat 9 currently is on station and operating at 43.10° W.L., co-located with Intelsat 11.³ At that location, Intelsat 9 will continue operating in the following TT&C frequencies:

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$860.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-01000, File No. SAT-STA-20140219-00025 (Feb. 28, 2014) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00991, File Nos. SAT-STA-20131219-00146 and SAT-STA-20131023-00125 (Jan. 10, 2014) (Public Notice); *Intelsat License LLC, Request for Extension of Special Temporary Authority to Drift and Operate Intelsat 9 Call Sign S2380*, File No. SAT-STA-20130424-00061 (filed Apr. 24, 2013); *Policy Branch Information; Actions Taken*, Report No. SAT-00909, File No. SAT-STA-20120621-00103 (Nov. 2, 2012) (Public Notice). Intelsat began operating Intelsat 9 in inclined orbit in late 2012. See Letter from Susan H. Crandall, Intelsat, to Marlene H. Dortch, FCC (Nov. 7, 2012) (notifying the FCC of the commencement of inclined orbit operations). The satellite's expected end of life is 2016.

³ Intelsat has a pending application to modify the Intelsat 9 license to allow the satellite's permanent redeployment to 43.10° W.L. See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00883, File No. SAT-MOD-20120703-00110 (July 20, 2012) (Public Notice).

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April 21, 2014
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Uplink:

14494.5 MHz (V)
14000.5 MHz (RHCP)

Downlink:

11700.5 MHz (V)

11702.5 MHz (V)
11700.5 MHz (RHCP)

11702.5 MHz (RHCP)
11700.5 MHz (H)
11702.5 MHz (H)

Intelsat will continue to utilize the following communications payload frequencies:

Uplink:

5925 – 6425 MHz
14000 – 14500 MHz

Downlink:

3700 – 4200 MHz
11450 – 11700 MHz
11700 – 12200 MHz

Grant of this STA further extension request is in the public interest because it will allow Intelsat to continue service at the 43.10° W.L. location.

Grant of this further STA extension request will not result in increased risk of harmful interference. Intelsat will continue to operate the TT&C and communications frequencies in accordance with its coordination agreements governing the nominal 43.0° W.L. location.

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collision with large debris or

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other operational space stations. Intelsat 9 is not located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite.⁴ Further, Intelsat is not aware of any other FCC-licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 9 at 43.10° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 9 at 43.10° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

Intelsat also requests that the waiver previously granted Intelsat 9, contained in footnote NG 104 of Section 2.106 and footnote 2 of Section 25.202(a)(1), with respect to the domestic use of the 11450-11700 MHz band, continue to apply at 43.10° W.L.⁵

For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this further extension request.

Sincerely,



Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

⁴ Intelsat 9 and Intelsat 11 are being operated in adjacent station-keeping boxes.

⁵ *PanAmSat Licensee Corp. Application for Authority to Use Extended Ku-Band Frequencies for Domestic Service*, Order and Authorization, 20 FCC Rcd 14642 (2005).