

\*corrected on 11/04/14\*

S2887 SAT-STA-20140919-00102 IB2014001869  
Intelsat License LLC  
Intelsat 30



File # SAT-STA-2014 0919- 00102

Call Sign S2887 Grant Date 10/24/14  
(or other identifier)

Term Dates period of  
From 10/25/14 To: 30 days

Approved by OMB  
3060-0678

Approved: Stephen J. Duall  
Stephen J. Duall  
Chief, Satellite Policy Branch

\*with conditions

Date & Time Filed: Sep 19 2014 4:56:47:046PM  
File Number: SAT-STA-20140919-00102  
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 Special Temporary Authority to Conduct IOT of the Intelsat 30 Satellite Call Sign S2887

1. Applicant

<b>Name:</b>	Intelsat License LLC	<b>Phone Number:</b>	703-559-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	703-559-8539
<b>Street:</b>	c/o Intelsat Corporation 7900 Tysons One Place	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>	Susan H. Crandall		

**Intelsat License LLC**  
**IBFS File No. SAT-STA-20140919-00102**  
**Call Sign: S2887**

The application of Intelsat License LLC (Intelsat), IBFS File No. SAT-STA-20140919-00102, is GRANTED. Accordingly, Intelsat is authorized for a period of 30 days, commencing October 25, 2014, to conduct in-orbit testing of the Intelsat 30 space station (Call Sign S2887) at the 132.0° W.L. orbital location using the 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), 11.7-12.2 GHz (space-to-Earth), 13.75-14.0 GHz (Earth-to-space), and 14.0-14.5 GHz (Earth-to-space) frequency bands. In addition, Intelsat is authorized to conduct antenna measurements at 3511 MHz (space-to-Earth) and 6536 MHz (Earth-to-space). Intelsat is authorized to conduct Telemetry, Tracking, and Command (TT&C) operations with the Intelsat 30 space station to maintain Intelsat 30 during in-orbit testing at the 132.0° W.L. orbital location, and to effect the drift of Intelsat 30 to the 95.05° W.L. orbital location upon completion of in-orbit testing, using the following center frequencies: 11.198.0 GHz, 11.1985 GHz, 11.19925 GHz, and 11.19975 GHz (space-to-Earth), and 13.7505 GHz and 14.0035 GHz (Earth-to-space). Operations under this authorization must be in accordance with the terms, conditions, and technical specifications set forth 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 shall not claim protection from interference caused to it by, any other lawfully operating station.
2. In the event of any harmful interference under this grant of special temporary authority, Intelsat must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
3. Intelsat must coordinate the operations of Intelsat 30 with existing geostationary space stations to ensure that no unacceptable interference results from its operations at the 132.0° W.L. orbital location or during drift to the 95.05° W.L. orbital location.
4. Intelsat 30's operations at 132.0° W.L. must be limited to IOT in the 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), 11.7-12.2 GHz (space-to-Earth), 13.75-14.0 GHz (Earth-to-space), and 14.0-14.5 GHz (Earth-to-space) frequency bands and must not include the provision of commercial services.
5. Intelsat must operate only the TT&C frequencies on Intelsat 30 during the space station's drift from the 132.0° W.L. orbital location to the 95.05° W.L. orbital location.
6. During in-orbit testing, Intelsat must maintain the Intelsat 30 space station within an east-west longitudinal station-keeping tolerance of  $\pm 0.05$  degrees of the 132.0° W.L. orbital location.
7. IOT operations in the 10.95-11.2 GHz (space-to-Earth), 11.45-11.7 GHz (space-to-Earth), 11.7-12.2 GHz (space-to-Earth), 13.75-14.0 GHz (Earth-to-space), and 14.0-14.5 GHz (Earth-to-space) frequency bands at 132.0° W.L. must comply with the conditions imposed in IBFS File No. SAT-LOA-20121025-00187, as amended by IBFS File No. SAT-AMD-20121221-00220 (granted August 14, 2014).<sup>1</sup>

---

<sup>1</sup> See *Policy Branch Information: Action Taken*, Public Notice, Report No. SAT-01040 (IBFS File No. SAT-LOA-20110610-00105) (Aug. 14, 2014).

**Intelsat License LLC**  
**IBFS File No. SAT-STA-20140919-00102**  
**Call Sign: S2887**

8. Intelsat's request for waiver of footnote NG52 of the United States Table of Allocations, 47 C.F.R. § 2.106, to use the 10.95-11.2 GHz and 11.45-11.7 GHz frequency bands for the limited purpose of IOT on an unprotected, non-interference basis in the United States is GRANTED, as conditioned. We find that waiver of footnote NG52 does not undermine the purpose of the rules because the waiver involves only earth stations that are receive-only in the 10.95-11.2 GHz and 11.45-11.7 GHz frequency band and thus are not capable of causing interference into fixed stations operating in this band. Furthermore, because Intelsat has agreed to accept any level of interference from fixed stations into its receive-only earth stations' operations in these bands, fixed station operators will not be required to coordinate their station operations with the space station operator's receive-only earth stations' operations. Under these circumstances, we determine that an additional coordination burden is not placed upon fixed station operators and their ability to expand service in the future would not be restricted in any manner. Grant of this waiver is consistent with prior Commission precedent.

9. Intelsat is afforded 30 days from the date of release of this action to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.

10. 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. Petitions for reconsideration under Section 1.106 of the Commission's rules or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the public notice indicating that this action was taken.

\* corrected on 11/04/14 \*



\*with conditions

File # SAT-STA-20140919-00102  
Call Sign S2887 Grant Date 10/24/14  
(or other identifier)  
Term Dates period of  
From 10/25/14 To: 30 days  
Approved: Stephen J. Duall

Stephen J. Duall  
Chief, Satellite Policy Branch

2. Contact

<b>Name:</b>	Susan H. Crandall	<b>Phone Number:</b>	703-559-7848
<b>Company:</b>	Intelsat Corporation	<b>Fax Number:</b>	703-559-8538
<b>Street:</b>	7900 Tysons One Place	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>	Susan H. Crandall	<b>Relationship:</b>	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 or Submission ID

4a. Is a fee submitted with this application?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity     Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification    CRY – Space Station (Geostationary)

5. Type Request

- Change Station Location                       Extend Expiration Date                       Other

6. Temporary Orbit Location

7. Requested Extended Expiration Date

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 a grant of Special Temporary Authority for 30 days, from October 25, 2014 through November 24, 2014, to conduct in-orbit testing of the Intelsat 30 satellite (Call Sign S2887) at 132.0 W.L and to drift the satellite to its permanent location of 95.05 W.L. Intelsat 30 currently is scheduled to be launched on

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  
Cynthia J. Grady

11. Title of Person Signing  
Regulatory 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).

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

**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.**

## **8. Description**

Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, from October 25, 2014 through November 24, 2014, to conduct in-orbit testing of the Intelsat 30 satellite (Call Sign S2887) at 132.0 W.L and to drift the satellite to its permanent location of 95.05 W.L. Intelsat 30 currently is scheduled to be launched on October 16, 2014.



**INTELSAT**

*Envision. Connect. Transform.*

September 19, 2014

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

Re: Request for Special Temporary Authority to Conduct In-Orbit Testing of the  
Intelsat 30 Satellite (File Nos. SAT-LOA-20121025-00187; SAT-AMD-20121221-00220); Call  
Sign S2887

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, from October 25, 2014 through November 24, 2014, to conduct in-orbit testing (“IOT”) of the Intelsat 30 satellite (Call Sign S2887) at 132.0° W.L. in the bands 10950-11200 MHz, 11450-11700 MHz, and 11700-12200 MHz (downlink), 13750-14000 MHz and 14000-14500 MHz (uplink), as well as run antenna cuts at 3511 MHz (downlink) and 6536 MHz (uplink),<sup>2</sup> and to drift the satellite to its permanent location of 95.05° W.L.<sup>3</sup> Intelsat 30 currently is scheduled to be launched on October 16, 2014. In support of its request, Intelsat submits the following information.

During IOT of Intelsat 30 at 132.0° W.L., Intelsat will operate in the above referenced C- and Ku-bands. To Intelsat’s knowledge, there are no co-frequency satellites within plus/minus six degrees of 132.0° W.L. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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 other operational space stations during IOT at 132.0° W.L. Intelsat 30 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any

---

<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159, and a \$930.00 filing fee electronically via the International Bureau's Filing System.

<sup>2</sup> The remainder of the satellite’s C-band frequencies—3400-3700 MHz (downlink) and 6425-6725 MHz (uplink)—will be tested at the satellite’s permanent licensed location of 95.05° W.L.

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01036, File Nos. SAT-LOA-20121025-00187 and SAT-AMD-20121221-00220 (Aug. 15, 2014) (Public Notice). During the drift from 132.0° W.L. to 95.05° W.L., only the satellite’s TT&C frequencies will be utilized. The TT&C frequencies are: 11198.0 MHz, 11198.5 MHz, 11199.25 MHz, and 11199.75 MHz (space-to-Earth), and 13750.5 MHz and 14003.5 MHz (Earth-to-space).



other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 30 at 132.0° W.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 30 that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

In addition, in order to conduct IOT in the 10950-11200 MHz and 11450-11700 MHz bands, this application for STA requests a waiver of the footnote NG52 to the U.S. Table of Frequency Allocations, which limits the use of 10700-11700 MHz to “international systems.”<sup>4</sup> Intelsat seeks waiver to permit the Intelsat 30 satellite to operate in 10950-11200 MHz and 11450-11700 MHz at 132.0° W.L. for the limited purpose of IOT.<sup>5</sup>

The Commission may grant a waiver for good cause shown.<sup>6</sup> The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.<sup>7</sup> In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>8</sup> Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists to waive the international only requirements for the use of the 10950-11200 MHz and 11450-11700 MHz frequency bands. The purpose of the international only rule in the 10700-11700 MHz band is to limit the number of the FSS service earth stations with which the co-primary fixed service would need to coordinate.<sup>9</sup> Intelsat will provide services in the 10950-11200 MHz and 11450-11700 MHz frequency bands only on a non-interference/non-protected basis, and therefore will not need to coordinate with fixed service stations. Additionally, IOT will be conducted for only a short duration.

Moreover, grant of this waiver is consistent with the Commission’s precedent. A waiver of the Table of Allocations is generally granted “when there is little potential interference into any service authorized under the Table of Frequency allocations and when the nonconforming operator accepts any interference from authorized services.”<sup>10</sup> The International Bureau has found that waiving the international only

---

<sup>4</sup> See 47 C.F.R. § 2.106 fn. NG52.

<sup>5</sup> Intelsat has received waiver of footnote NG52 for operations in the 11450-11700 MHz band at the 95.05° W.L. location. See Intelsat License LLC, Application for Authority to Launch and Operate Intelsat 30 Satellite, File Nos. SAT-LOA-20121025-00187 and SAT-AMD-20121221-00220, ¶ 15 (stamp grant Aug. 14, 2014).

<sup>6</sup> 47 C.F.R. §1.3.

<sup>7</sup> *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

<sup>8</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

<sup>9</sup> See *Satellite Services*, 26 RR 2d 1257, 1263-65 (1973). See also *EchoStar KuX Corporation Application for Authority to Construct, Launch and Operate a Geostationary Satellite Using the Extended Ku-band Frequencies in the Fixed-Satellite Service at the 83° W.L. Orbital Location*, Order and Authorization, DA 04-3162, 9 (Int’l Bur., Sept. 30, 2004) (“*EchoStar 83° Waiver*”).

<sup>10</sup> See *The Boeing Company*, Order and Authorization, 16 FCC Rcd 22645, 22651 (Int’l Bur. & OET 2001); *Application of Fugro-Chance, Inc. for Blanket Authority to Construct and Operate a Private Network of Receive-Only Mobile Earth Stations*, Order and Authorization, 10 FCC Rcd 2860 (Int’l Bur. 1995) (authorizing MSS in

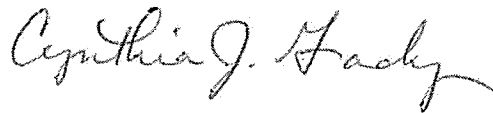
Ms. Marlene H. Dortch  
September 19, 2014  
Page 3

restriction would not undermine the purpose of the rules if the party seeking a waiver will be utilizing earth stations that are receive-only in these bands and thus “not capable of causing interference into FS stations” operating in the bands.<sup>11</sup> The earth stations operating in the 10950-11200 MHz and 11450-11700 MHz bands on Intelsat 30 will not transmit in these bands and Intelsat agrees to accept any level of interference into those earth stations from fixed service stations in these bands. Accordingly, the earth stations operating in these bands pose no interference concerns with respect to co-frequency fixed service stations.

The IOT of Intelsat 30’s Ku-band payload and the running of antenna cuts in certain C-band frequencies at 132.0° W.L. is a critical step in ensuring that the satellite will be fully operational at 95.05° W.L. This, in turn, will ensure continuity of service to customers at the 95.05° W.L. location, and thereby promotes the public interest.

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

Sincerely,



Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Stephen Duall  
Jay Whaley  
Cindy Spiers

---

the C-band); *see also Application of Motorola Satellite Communications, Inc. for Modification of License, Order and Authorization*, 11 FCC Rcd 13952-13956 (Int’l Bur. 1996) (authorizing service to fixed terminals in bands allocated the mobile satellite service).

<sup>11</sup> EchoStar 83° Waiver, ¶ 13.