

S2229 SAT-STA-20141224-00137 IB2014002491
Intelsat License LLC
Intelsat 7



File # SAT-STA-20141224-00137

Call Sign S2229 Grant Date 03/26/15
(or other identifier)

Term Dates period of Approved by OMB
From 03/26/15 To: 180 days 3060-0678

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

Date & Time Filed: Dec 24 2014 11:59:33:046AM
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Callsign:

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request for Special Temporary Authority to Operate Intelsat 7 at 18.2 W.L., Call Sign S2229

1. Applicant

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

Attachment to Grant
IBFS File No. SAT-STA-20141224-00137
Call Sign S2229

The application of Intelsat License LLC (Intelsat), IBFS File No. SAT-STA-20141224-00137, for special temporary authority to operate the Intelsat 7 space station (Call Sign S2229), is GRANTED.¹

Accordingly, Intelsat is authorized for a period of 180 days, commencing March 26, 2015, to provide Fixed-Satellite Service via the Intelsat 7 space station, in inclined orbit,² at the 18.2° W.L. orbital location in the 3400-3625 MHz (space-to-Earth) and 6425-6650 MHz (Earth-to-space) frequency bands.³ Intelsat is also authorized, on a temporary basis, to perform telemetry, tracking, and command operations necessary to maintain Intelsat 7 at the 18.2° W.L. orbital location using the following center frequencies: 11451 MHz and 11453 MHz (space-to-Earth); and 13998 MHz (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 rules of the Federal Communications Commission, 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 coordinate the operations of Intelsat 7 with existing geostationary space stations to ensure that no unacceptable interference results from its operations at the 18.2° W.L. orbital location.
4. While at the 18.2° E.L. orbital location, Intelsat must maintain the Intelsat 7 space station with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
5. In connection with the provision of service in any particular country, Intelsat is obliged to comply with the applicable laws, regulations, rules, and licensing procedures of that country.
6. Intelsat must operate Intelsat 7 at the 18.2° E.L. orbital location in accordance with any existing coordination agreements for this location.


¹ See Policy Branch Information, Satellite Space Applications Accepted for Filing, Public Notice, Report No. SAT-01016, IBFS File No. SAT-STA-20141224-00137. No comments were filed. At the time of its launch, Intelsat 7 was named PAS-7 for commercial purposes, but PAS-21 for FCC filings. In 2007, Intelsat filed a letter notifying the Commission that it had renamed PAS-7/PAS-21 (Call Sign 2229) as Intelsat 7. See Letter from Susan Crandall, Assistant General Counsel, Intelsat Corp., to Marlene H. Dortch, Secretary, FCC, filed Jan. 8, 2007, available in IBFS File No. SAT-MOD-20060228-00017. Intelsat 7 is currently authorized to operate at the 68.5° E.L. orbital location. See IBFS File No. SAT-MOD-20130819-00107.

² See Letter from Susan Crandall, Assistant General Counsel, Intelsat Corp., to Marlene H. Dortch, Secretary, FCC, filed May 7, 2013.

³ Intelsat 20 is also authorized to operate at 68.5° E.L. See IBFS File No. SAT-LOA-20111024-00208 (grant stamp July 26, 2012). Intelsat 20 does not use the 6675-6725 MHz, 3400-3700 MHz, and 12.25-12.5 GHz frequency bands that were being used by Intelsat 10 and Intelsat 7 at 68.5° E.L. *Id.* at grant stamp condition #20. Intelsat 10 is no longer located at 68.5° E.L. See Letter from Susan Crandall, Assistant General Counsel, Intelsat Corp., to Marlene H. Dortch, Secretary, FCC, filed Oct. 24, 2012, available in IBFS File No. SAT-STA-20120925-00155. Pursuant to the instant grant, Intelsat 7 will be operating away from the 68.5° E.L. orbital location for a period of 180 days. Additionally, we note that although the Intelsat 7 space station also includes the 3625-3700 MHz, 10.95-11.2 GHz, 11.450-11.7 GHz, 13.75-14.0 GHz, and 14.0-14.25 GHz frequency bands, Intelsat is not seeking authority to operate in these bands in this application, and thus we do not authorize Intelsat to operate Intelsat 7 in these frequencies.

Attachment to Grant
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Call Sign S2229

7. In the 13.75-14.0 GHz band (Earth-to-space), receiving space stations in the Fixed-Satellite Service must not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations.
8. Operators of earth stations accessing the Intelsat 7 space station in the 13.75-14.0 GHz band are encouraged to cooperate voluntarily with NASA in order to facilitate continued operation of the NASA Tropical Rainfall Measuring Mission (TRMM) satellite.
9. Operations of any earth station in the United States and its possessions communicating with the Intelsat 7 space station in the 13.75-14.0 GHz band (Earth-to-space) must comply with footnote US356 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US356, which specifies that in the 13.75-14.0 GHz band, an earth station in the fixed-satellite service shall have a minimum antenna diameter of 4.5 m and the EIRP of any emission should be at least 68 dBW and should not exceed 85 dBW. In addition the EIRP, averaged over one second, radiated by a station in the radiolocation service shall not exceed 59 dBW. Receiving space stations in the fixed-satellite service shall not claim protection from radiolocation transmitting stations operating in accordance with the United States Table of Frequency Allocations. ITU Radio Regulation No. 5.43A does not apply. Operations of any earth station located outside the United States and its possessions communicating with the Intelsat 7 space station in the 13.75-14.0 GHz band (Earth-to-space) must be consistent with footnote 5.502 to the ITU Radio Regulations, which allows a minimum antenna diameter of 1.2 meters for earth stations of a geostationary satellite orbit network and specifies mandatory power limits.
10. Operations of Earth Stations within 200 km of the NASA Tracking and Data Relay Satellite System (TDRS) receiving ground station at Blossom Point, MD that communicate with the Intelsat 7 space station using the 13.998 GHz center frequency (Earth-to-space) must be coordinated with NTIA.
11. This action is without prejudice to any decision regarding Intelsat's replacement expectancy to operate a space station in the 6675-6725 MHz and 3400-3700 MHz frequency bands at the 68.5° E.L. orbital location.
12. Intelsat is afforded 30 days from the date of release of this grant and authorization to decline this authorization as conditioned. Failure to respond within this period will constitute formal acceptance of the authorization as conditioned.
13. 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 reconsideration 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.

 GRANTED * International Bureau *with conditions	File # <u>SAT-STA-20141224-00137</u>
	Call Sign <u>S2229</u> Grant Date <u>03/26/15</u> (or other identifier)
	Term Dates <u>period of</u> From <u>03/26/15</u> To: <u>180 days</u>
	Approved: <u>Stephen J. Duall</u> Stephen J. Duall Chief, Satellite Policy Branch

2. Contact	
Name: Susan H. Crandall	Phone Number: 703-559-7848
Company: Intelsat Corporation	Fax Number: 703-559-8539
Street: 7900 Tysons One Place	E-Mail: susan.crandall@intelsat.com
City: McLean	State: VA
Country: USA	Zipcode: 22102 -5972
Attention:	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 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 checked="" type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input type="radio"/> 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 grant of Special Temporary Authority for 180 days, commencing upon grant, to operate Intelsat 7 (S2229) at 18.2 W.L. in the TT&C frequencies 13998 MHz (RHCP), 11451 MHz (H, LHCP), and 11453 MHz (V, LHCP), as well as the communications frequencies 3400-3625 MHz and 6425-6650 MHz.

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).

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. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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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.

December 24, 2014

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

Re: Request for Special Temporary Authority to Operate Intelsat 7 at 18.2° W.L.; Call Sign: S2229

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)¹ for 180 days, commencing upon grant, to operate Intelsat 7 (S2229) at 18.2° W.L. in the TT&C frequencies 13998 MHz (RHCP), 11451 MHz (H, LHCP), and 11453 MHz (V, LHCP), as well as the communications frequencies 3400 – 3625 MHz and 6425 – 6650 MHz.² Intelsat 7 will temporarily be collocated with the Intelsat 901 satellite, which currently operates at the 18.0° W.L. orbital location.³ Intelsat seeks this STA in order to provide additional capacity at 18.2° W.L.

Intelsat 7 is permanently licensed at 68.65° E.L.⁴ The satellite arrived on-station at 18.2° W.L. on December 3, 2014. Intelsat will operate Intelsat 7 at 18.2° W.L. in conformance with its coordination agreements related to the nominal 18.0° W.L. location or on a non-interference, non-protected basis. Additionally, Intelsat agrees to operate Intelsat 7 at 18.2° W.L. in accordance with the relevant frequency-related conditions in the Commission’s 2004 order granting authority for the Intelsat 7 satellite to operate at 68.5° E.L.⁵

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

² Although Intelsat 7 also includes the bands 3625 – 3700 MHz, 10950 – 11200 MHz, 11450 – 11700 MHz, 13750 – 14000 MHz, and 14000 – 14250 MHz, Intelsat is not seeking authority to operate in these bands in this request.

³ See *The Applications of Intelsat LLC For Authority to Operate, and to Further Construct, Launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, File Nos: SAT-A/O-20000119-00002 to SAT-A/O-20000119-00018; SAT-AMD-20000119-00029 to SAT-AMD-20000119-00041; and SAT-LOA-20000119-00019 to SAT-LOA-20000119-00028 (2000).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-01004, File No. SAT-MOD-20130819-00107 (Mar. 21, 2014) (Public Notice).

⁵ See *PanAmSat Licensee Corp. Application for Authority to Launch and Operate a Hybrid Communications Satellite Known at 68.5° E.L.*, Order and Authorization, 19 FCC Rcd 6137, File Nos. SAT-LOA-19960202-00017, SAT-AMD-19960411-0055, SAT-AMD-19971119-00187, SAT-AMD-19991217-00129, and SAT-STA-20001115-00162 (2004). Intelsat 7’s location subsequently was changed to 68.65° E.L. See *supra* n.4.

Ms. Marlene H. Dortch
December 24, 2014
Page 2

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Intelsat 7 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.⁶

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 7 at 18.2° W.L. Finally, Intelsat is not aware of any system that has an overlapping station-keeping volume with Intelsat 7 at 18.2° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

The temporary operation of Intelsat 7 at 18.2° W.L. will provide additional capacity at that location. Accordingly, grant of this STA request is in the public interest.

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

Sincerely,

/s/ Susan H. Crandall

Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

⁶ At the nominal 18.0° W.L. orbital location, Intelsat 7 will be collocated with the Intelsat 901 satellite. Intelsat 7 and Intelsat 901 will operate in separate station keeping boxes, and Intelsat will coordinate their operations internally.