S2939 SAT-STA-20160722-00069 IB2016001687
Intelsat License LLC
Intelsat 33e

GRANTED*
International Bureau
* with conditions

File # SAT-STA-20160722-00069
Call Sign S2939 Grant Date 08/04/16
(or other identifier)
Term Dates period of
From 09/10/16 To: 30 days
Approved: Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060–0678

Date & Time Filed: Jul 22 2016 3:22:03:200PM
File Number: SAT–STA–20160722–00069
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 30–Day STA to Conduct IOT of the Intelsat 33e Satellite, Call Sign S2939

1. Applicant

Name:	Intelsat License LLC	**Phone Number:**	703–559–7848
DBA Name:		**Fax Number:**	703–559–8538
Street:	c/o Intelsat Corporation	**E–Mail:**	susan.crandall@intelsat.com
	7900 Tysons One Place		
City:	McLean	**State:**	VA
Country:	USA	**Zipcode:**	22102 –5972
Attention:	Susan H. Crandall		

ATTACHMENT TO GRANT

Intelsat License LLC
IBFS File No. SAT-STA-20160722-00069

IBFS File No(s):	SAT-STA-20160722-00069	**GRANTED – With Conditions**
Licensee/Grantee:	Intelsat License LLC	
Call Sign:	S2939	
Satellite Name:	Intelsat 33e	
Orbital Location: (required station-keeping tolerance)	59.55° E.L. (+/- 0.05 degrees east/west)	
Administration:	United States of America	
Nature of Service:	Fixed-Satellite Service (FSS)	**International Bureau Satellite Division**
Scope of Grant:	Special temporary authority for a period of 30 days to perform in-orbit testing (IOT) of Intelsat 33e at the 59.55° E.L. orbital location and to perform Telemetry, Tracking, and Command (TT&C) operations necessary to maintain Intelsat 33e at 59.55° E.L. and to effect drift of Intelsat 33e to its authorized orbital location at 60.0° E.L. upon completion of IOT.	
Service Area(s):	Not Applicable	
Frequencies:	Payload testing frequencies: 3625–4200 MHz (space-to-Earth) 5850–6725 MHz (Earth-to-space) 10.95–11.2 GHz (space-to-Earth) 11.2–11.45 GHz (space-to-Earth)[1] 11.45–12.2 GHz (space-to-Earth) 12.5–12.6 GHz (space-to-Earth) 13.75–13.85 GHz (Earth-to-space) 18.3–20.2 GHz (space-to-Earth) 14.0–14.5 GHz(Earth-to-space) 17.3–17.8 GHz (Earth-to-space) 28.1–30.0 GHz (Earth-to-space) TT&C center frequencies: 4197.25 MHz, 4197.75 MHz, 4198.25 MHz, and 4198.75 MHz (space-to-Earth); and 6422.00 MHz, 6424.5 MHz, 5850.5 MHz, and 5853.0 MHz (Earth-to-space)	

Operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission's rules not waived herein. This grant is also 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 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 33e with existing geostationary space stations to ensure that no unacceptable interference results from its operations at the 59.55° E.L. orbital location or during drift from the 59.55° E.L. orbital location to the 60.0° E.L. orbital location.

[1] We note that Intelsat did not seek authority, and is not licensed, to operate in this frequency band at 60.0° E.L. Nonetheless, Intelsat requests authority to perform IOT in this band.

4. Intelsat 33e's operations at the 59.55° E.L. orbital location must be limited to IOT and must not include the provision of commercial services.

5. Intelsat must operate only the TT&C frequencies on Intelsat 33e during the space station's drift from the 59.55° E.L. orbital location to the 60.0° E.L. orbital location.

6. During in-orbit testing, Intelsat must maintain the Intelsat 33e space station within an east-west longitudinal station-keeping tolerance of ±0.05 degrees of the 59.55° E.L. orbital location.

7. IOT operations for Intelsat 33e must comply with the conditions imposed in IBFS File No. SAT-LOA-20150327-00016.[2]

8. Intelsat's request that the previously granted waivers of Sections 25.210(f) and 25.210(i)(1) of the Commission's rules, 47 CFR §§ 25.210(f) and 25.210(i)(1), be extended to the satellite at 59.55° E.L, is GRANTED, for the reasons set forth in the previous grant.[3]

Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.

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

Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).

Action Date:	August 4, 2016	
Term Dates	**From:** September 10, 2016	**To:** period of 30 days

Approved:

Stephen J. Duall
Chief, Satellite Policy Branch

[2] *See* Intelsat License LLC's Application for Authority to Construct, Deploy, and Operate a C-, Ku-, and Ka-band satellite, Intelsat 33e, at 60.0° E.L., IBFS File No. SAT-LOA-20150327-00016 (Grant stamp, February 25, 2016).
[3] *Id.*

2. Contact

Name:	Cynthia J. Grady	**Phone Number:**	703−559−6949
Company:	Intelsat Corporation	**Fax Number:**	703−559−8538
Street:	7900 Tysons One Place	**E−Mail:**	cynthia.grady@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?

◉ 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, beginning September 10, 2016, to conduct in-orbit testing of the Intelsat 33e satellite (Call Sign S2939) at 59.55 E.L. and to drift the satellite to its permanent location of 60.0 E.L.

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	11. Title of Person Signing
Cynthia J. Grady	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).

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INTELSAT
Envision. Connect. Transform.

July 22, 2016

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

Re: Request for Special Temporary Authority to Conduct In-Orbit Testing of Intelsat 33e; Call Sign S2939

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")[1] for 30 days, beginning September 10, 2016 to conduct in-orbit testing ("IOT") of the Intelsat 33e satellite (Call Sign S2939) at 59.55° E.L. and to drift the satellite to its permanent location of 60.0° E.L.[2] Intelsat 33e is scheduled to be launched on August 24, 2016. The IOT period is expected to last approximately 35 days; and the drift to 60.0° E.L. is expected to last approximately four days.

Intelsat 33e IOT payload testing will be performed in the following frequency bands:

- 3625 – 4200 MHz, 10950 – 11200 MHz, 11200 – 11450 MHz,[3] 11450 – 12200 MHz, 12500 – 12600 MHz, and 18300 – 20200 MHz (space-to-Earth);
- 5850 – 6725 MHz, 13750 – 13850 MHz, 14000 – 14500 MHz, 17300 – 17800 MHz, and 28100 – 30000 MHz (Earth-to-space).

Telemetry, Tracking, and Command ("TT&C") services for Intelsat 33e will be performed in the following center frequencies:

- 4197.25 MHz, 4197.75 MHz, 4198.25MHz, and 4198.75 MHz (space-to-Earth);
- 6422.00 MHz, 6424.5 MHz, 5850.5 MHz, and 5853.0 MHz (Earth-to-space).

In support of its request, Intelsat submits the following information.

During the IOT of Intelsat 33e, Intelsat will operate in the above referenced C-, Ku-, and Ka-bands. Intelsat has identified the operational satellites within +/-6 degrees of the IOT location. Coordination is

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[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] *See Policy Branch Information; Actions Taken*, Report No. SAT-01139, File No. SAT-LOA-20150327-00016 (Feb. 26, 2016) (Public Notice). During the drift from 59.55° E.L. to 60.0° E.L., only the satellite's TT&C frequencies will be utilized.

[3] Intelsat did not seek authority, and is not licensed, to operate in this band at 60.0° E.L.

ongoing with several operators of such satellites to resolve potential interference issues. Intelsat expects to complete coordination discussions before launch of the Intelsat 33e satellite. 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 59.55° E.L. Intelsat 33e 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 other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 33e at 59.55° E.L. In addition, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 33e at 59.55° E.L. that is the subject of an International Telecommunication Union ("ITU") filing and that is either in orbit or progressing towards launch.

Intelsat's IOT operations in the 12500 – 12600 MHz, 17300 – 17800 MHz, 18800 – 19300 MHz, and 19300 – 19700 MHz frequency bands at the 59.55° E.L. orbital location will only occur in Regions 1 and 3, consistent with the frequency allocations in Regions 1 and 3.

Finally, Intelsat requests that the waivers previously granted to Intelsat 33e at 60.0° E.L. be extended to the satellite at 59.55° E.L. In particular, Intelsat requests that the previously-granted waivers of Sections 25.210(f) and 25.210(i)(1) be extended to the satellite at 59.55° E.L., for the reasons previously set forth in the previous grant.[4]

The IOT of Intelsat 33e's C-, Ku-, and Ka-band payloads at 59.55° E.L. is a critical step in ensuring that the satellite will be fully operational at 60.0° E.L. This, in turn, will provide additional capacity to customers at the 60.0° E.L. location, and thereby promotes the public interest.

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

Sincerely,

/s/ *Cynthia J. Grady*

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers

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4 *See supra* note 2.