

S2750 SAT-STA-20171016-00139 IB2017002943
Intelsat License LLC
Intelsat 16



File # SAT-STA-20171016-00139
Call Sign S2750 Grant Date 10/17/19
(or other identifier)
Term Dates period of
From 10/17/19 To: 30 days
Approved: Stephen J. Duall

Approved by OMB
3060-0678

Date & Time Filed: Oct 16 2017 2:15:05:890PM
File Number: SAT-STA-20171016-00139
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 Drift and Operate Intelsat 16 at 76.2 W.L., Call Sign S2750

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
 Intelsat License LLC
 IBFS File No. SAT-STA-20171016-00139

IBFS File No(s):	SAT-STA-20171016-00139	GRANTED – With Conditions  International Bureau Satellite Division
Licensee/Grantee:	Intelsat License LLC	
Call Sign:	S2750	
Satellite Name:	Intelsat 16	
Orbital Location: (required station-keeping tolerance)	76.2° W.L. (+/- 0.05 degrees east/west)	
Administration:	United States of America	
Nature of Service:	Telemetry, Tracking and Command (TT&C); Fixed Satellite Service (FSS)	
Scope of Grant:	Special temporary authority for a period of 30 days to (1) conduct TT&C operations in connection with the drift of the Intelsat 16 space station from the 58.1° W.L. orbital location to the 76.2° W.L. orbital location and with maintaining it at that location, and (2) provide FSS via Intelsat 16 upon arrival at the 76.2° W.L. orbital location.	
Service Area(s):	Puerto Rico, U.S. Virgin Islands, Caribbean, Central America and Mexico	
Frequencies:	11.7–12.2 GHz (space-to-Earth) 14.0–14.5 GHz (Earth-to-space) TT&C Center Frequencies: 13997.5 MHz and 14499.5 MHz (Earth-to-space) 12198.25 MHz and 12198.75 MHz (space-to-Earth)	

Unless otherwise specified herein, 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. Operations pursuant to this special temporary authority must be on an unprotected and non-harmful interference basis, i.e., the Intelsat 16 space station must not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, Intelsat must cease operations immediately upon notification of such interference, and shall inform the Commission, in writing, immediately of such an event.
2. Intelsat must coordinate its operations so that no harmful interference is caused to any other lawfully operating satellites or radiocommunication systems. Intelsat shall contact the following personnel prior to initiation of service for such coordination:

 FCC: Roberto Mussenden (202-391-2220 (BB); 703-585-2086 (cell); 8816-41-479183 (Sat phone))

 FEMA: Jarrett Devine (Jarrett.Devine@fema.dhs.gov)

 Intelsat shall cease operations immediately upon notification of such interference and inform the Commission in writing immediately of such an event.
3. 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.
4. Intelsat must operate Intelsat 16 at the 76.2° W.L. orbital location in compliance with all existing or future coordination agreements for this location. In the absence of a coordination agreement, such communications must comply with applicable provisions of the ITU Radio Regulations as the

ATTACHMENT TO GRANT
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Commission cannot guarantee the success of the required conditions.

5. While at the 76.2° W.L. orbital location, Intelsat must maintain the Intelsat 16 spacecraft with an east/west longitudinal station-keeping tolerance of +/- 0.05 degrees.
6. Intelsat must operate only the TT&C frequencies on Intelsat 16 during the space station's drift from the 58.1° W.L. orbital location to the 76.2° W.L. orbital location
7. The operations of Intelsat 16 and associated earth stations must comport with the applicable uplink and downlink limits in 47 CFR § 25.140(a)(3) of the Commission's rules, unless Intelsat coordinates any non-conforming operations with the operations of U.S.-licensed geostationary orbit space stations within 6 degrees of the 76.2° W.L. orbital location. Intelsat must also comport with the maximum power limits indicated in existing or future coordination agreements at 76.2° W.L. Non-conforming operation must also be coordinated with respect to those operations of non-U.S.-licensed space stations within 6 degrees of 76.2° W.L. involving approved communications with U.S.-licensed earth stations.
8. Pursuant to footnote US342 of the United States Table of Frequency Allocations, 47 CFR § 2.106, services operating in the 14.47-14.50 GHz band shall take all practicable steps to protect the radio astronomy service from harmful interference.
9. Intelsat's request for waiver of 47 CFR § 25.120(a), which requires an STA request to be received by the Commission at least 3 working days prior to the date of proposed operation, is GRANTED, due to the exigent circumstances that are reflected in this STA request and in accordance with emergency procedures put in place to provide communications in areas affected by Hurricane Maria.

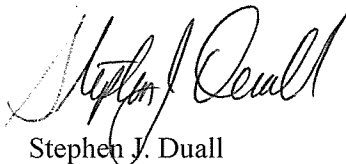
Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.

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:	October 17, 2017	
Term Dates	From: October 17, 2017	To: period of 30 days

Approved:



Stephen J. Duall
 Chief, Satellite Policy Branch

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

76.2 W.L.

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 30 days, immediately upon grant, to drift Intelsat 16 (S2750) to, and operate at, 76.2 W.L. in the telemetry, tracking, and command frequencies 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz, as well as the communications frequencies 11700 - 12200 MHz and 14000 -

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).

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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.

8. Description

Intelsat License LLC herein requests grant of Special Temporary Authority for 30 days, immediately upon grant, to drift Intelsat 16 (S2750) to, and operate at, 76.2 W.L. in the telemetry, tracking, and command frequencies 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz, as well as the communications frequencies 11700 - 12200 MHz and 14000 - 14500 MHz. Intelsat seeks this STA in order to assist a customer in responding to the damage caused by Hurricane Maria to the communications networks in Puerto Rico.

October 16, 2017

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

Re: Request for Special Temporary Authority to Drift and Operate Intelsat 16 at 76.2° W.L.;
Call Sign: S2750
Expedited Treatment Requested

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)¹ for 30 days, immediately upon grant, to drift Intelsat 16 (S2750) to, and operate at, 76.2° W.L. in the telemetry, tracking, and command (“TT&C”) frequencies 13997.5 MHz, 14499.5 MHz, 12198.25 MHz, and 12198.75 MHz, as well as the communications frequencies 11700 – 12200 MHz and 14000 – 14500 MHz.² Intelsat seeks this STA in order to assist a customer in responding to the damage caused by Hurricane Maria to the communications networks in Puerto Rico.

Intelsat 16 is currently is licensed to operate at 58.1° W.L.³ Intelsat is concurrently filing a 180-day STA request to operate Intelsat 16 at 76.2° W.L. Intelsat expects that the drift of Intelsat 16 to 76.2° W.L. will take approximately two weeks. During the drift Intelsat will only utilize the TT&C frequencies and operate on a non-interference/non-protected basis. The drift will be coordinated with all operators of co-frequency satellites in the drift path. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

Once at 76.2° W.L., Intelsat will operate Intelsat 16 on a non-interference/non-protected basis and in conformance with coordination agreements concerning the nominal 76.2° W.L. location. As the Commission is aware, DIRECTV Enterprises, LLC (“DIRECTV”) currently holds a license to operate in

¹ Intelsat has filed this STA request, an FCC Form 159, and a \$945.00 filing fee electronically via the International Bureau’s Filing System.

² Although Intelsat 16 also includes the bands 10700 – 11450 MHz, 12750 – 13250 MHz, and 13750 – 14000 MHz, Intelsat is not seeking authority to operate in these bands in this request except for the 13997.5 MHz frequency used for uplink TT&C, noted above.

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01160, File No. SAT-MOD-20160201-00009 (May 20, 2016) (Public Notice).

Ku-band at 76.2° W.L. (“DIRECTVKU-76W License”).⁴ DIRECTV fully supports this request to allow Intelsat 16 temporarily to operate at 76.2° W.L.

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 16 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, with the exception of the DIRECTVKU-76W License, 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 16 at 76.2° W.L. Finally, Intelsat is not aware of any system that has an overlapping station-keeping volume with Intelsat 16 at 76.2° W.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

To the extent necessary, Intelsat requests a waiver of 47 C.F.R. § 25.120(a), which requires an STA request to be “received by the Commission at least 3 working days prior to the date of proposed ... operation[s.]” The Commission may grant a waiver for good cause shown.⁵ 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.⁶ 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 47 C.F.R. § 25.120(a) because a natural disaster has decimated communications in Puerto Rico. In the weeks following Hurricane Maria, the island has been unable to overcome the damage caused to the communications networks and continues to desperately need basic communications. In order to reposition Intelsat 16 to 76.2° W.L. quickly, and given that the satellite drift will take two weeks, Intelsat seeks immediate authorization rather than filing a request 3 working days prior to the proposed drift and operations. Accordingly, “extraordinary reasons for the delay” justify waiver of the rule.

Grant of this STA request will allow Intelsat to expeditiously drift Intelsat 16 to a 76.2° W.L., where it will provide critical communication services in Puerto Rico. Accordingly, grant of this STA request is in the public interest.

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-00943, File No. SAT-LOA-20121101-00190 (Apr. 19, 2013) (Public Notice).

⁵ 47 C.F.R. §1.3.

⁶ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

Ms. Marlene H. Dortch
October 16, 2017
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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

Cc: Jose Albuquerque
Stephen Duall
Jay Whaley
Cindy Spiers
Kathryn Medley