

S2972 SAT-STA-20171115-00156 IB2017003227
Intelsat License LLC
IS37e



File # SAT-STA-20171115-00156
Call Sign S2972 Grant Date 11/22/17
(or other identifier)
Term Dates period of
From 11/22/17 To: 30 days
Approved: *Stephen J. Duall*

Approved by OMB
3060-0678

Date & Time Filed: Nov 15 2017 4:57:25:213PM
File Number: SAT-STA-20171115-00156
Callsign:

*with conditions

Stephen J. Duall
Chief, Satellite Policy Branch

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 Extension of Special Temporary Authority to Conduct In-Orbit Testing of Intelsat 37e, Call Sign S2972

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-20171115-00156

IBFS File No(s):	SAT-STA-20171115-00156	GRANTED – With Conditions  International Bureau Satellite Division
Licensee/Grantee:	Intelsat License LLC	
Call Sign:	S2972	
Satellite Name:	Intelsat 37e	
Orbital Location: (required station-keeping tolerance)	84.55° E.L. (+/- 0.05 degrees east/west)	
Administration:	United States of America	
Nature of Service:	In-Orbit Testing (IOT); Telemetry, Tracking, and Command (TT&C)	
Scope of Grant:	Special temporary authority for a period of 30 days to continue to perform IOT of Intelsat 37e at the 84.55° E.L. orbital location and to perform TT&C operations in connection with maintaining Intelsat 37e at 84.55° E.L. and effecting the drift of Intelsat 37e to its authorized orbital location at 18.0° W.L. upon completion of IOT.	
Service Area(s):	Not Applicable	
Frequencies:	Payload testing frequencies: 3400–4200 MHz (space-to-Earth) 5850–6650 MHz (Earth-to-space) 10.7–11.95 GHz (space-to-Earth) 12.5–12.75 GHz (space-to-Earth) 13.0–13.25 GHz (Earth-to-space) 13.75–14.5 GHz (Earth-to-space) 18.3–18.8 GHz (space-to-Earth) 19.7–20.2 GHz (space-to-Earth) 28.35–28.85 GHz (Earth-to-space) 29.5–30.0 GHz (Earth-to-space) TT&C center frequencies: 4197.75 MHz, 4198.25 MHz, 4198.75 MHz, and 4199.25 MHz (space-to-Earth); and 5850.5–5853.0 MHz and 6422.5–6424.5 MHz (Earth-to-space), selectable via ground command in 100 kilohertz steps.	
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>i.e.</i>, Intelsat 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 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. 2. Intelsat must coordinate the operations of Intelsat 37e with existing geostationary space stations to ensure that no unacceptable interference results from its operations at the 84.55° E.L. orbital location or during drift from the 84.55° E.L. orbital location to the 18.0° W.L. orbital location. 3. Intelsat 37e’s operations at the 84.55° E.L. orbital location must be limited to IOT and must not include the provision of commercial services. 4. Intelsat must operate only the TT&C frequencies on Intelsat 37e during the space station's drift from the 84.55° E.L. orbital location to the 18.0° W.L. orbital location.		

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IBFS File No. SAT-STA-20171115-00156

5. During in-orbit testing, Intelsat must maintain the Intelsat 37e space station within an east-west longitudinal station-keeping tolerance of ± 0.05 degrees of the 84.55° E.L. orbital location.

6. The U.S. Administration does not consent to use of the Intelsat 37e space station operations herein authorized for claiming bringing into use or continuing the use of frequency assignments.

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:	November 22, 2017
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Term Dates	From: November 22, 2017	To: period of 30 days
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Approved:



Stephen J. Duall
Chief, Satellite Policy Branch

2. Contact			
Name:	Cynthia J. Grady	Phone Number:	703-559-6949
Company:	Intelsat Corporation	Fax Number:	703-559-8539
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 an additional 30 days of the Special Temporary Authority previously granted Intelsat to conduct in-orbit testing of the Intelsat 37e satellite at 84.55 E.L., and to drift the satellite to its permanent location of 18.0 W.L. Intelsat 37e was launched on September 29, 2017. The IOT period is expected to last

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

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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 an additional 30 days of the Special Temporary Authority previously granted Intelsat to conduct in-orbit testing of the Intelsat 37e satellite at 84.55 E. L., and to drift the satellite to its permanent location of 18.0 W.L. Intelsat 37e was launched on September 29, 2017. The IOT period is expected to last approximately 45 days and the drift to 18.0 W.L. is expected to last approximately 30 days.

November 15, 2017

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

Re: Request for Extension of Special Temporary Authority to Conduct In-Orbit Testing of Intelsat 37e; Call Sign S2972

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of the Special Temporary Authority ("STA")¹ previously granted Intelsat to conduct in-orbit testing ("IOT") of the Intelsat 37e satellite (Call Sign S2972) at 84.55° E.L.,² and to drift the satellite to its permanent location of 18.0° W.L.³ Intelsat 37e was launched on September 29, 2017. The IOT period is expected to last approximately 45 days and the drift to 18.0° W.L. is expected to last approximately 30 days.

Intelsat 37e payload testing will continue to be performed in the following frequency bands:

- 3400-4200 MHz, 10700-11950 MHz, and 12500-12750 MHz, 18300-18800 MHz, and 19700-20200 MHz (space-to-Earth); and
- 5850-6650 MHz, 13000-13250 MHz, 13750-14500 MHz, 28350-28850 MHz, and 29500-30000 MHz (Earth-to-space).

Telemetry, Tracking, and Command ("TT&C") services for Intelsat 37e will continue to be performed at the following center frequencies and in the following frequency bands:

- 4197.75 MHz, 4198.25 MHz, 4198.75 MHz, and 4199.25 MHz (space-to-Earth); and
- 5850.5-5853.0 MHz and 6422.0-6424.5 MHz (Earth-to-space), selectable via ground command in 100 kilohertz steps.

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 See *Policy Branch Information; Actions Taken*, Report No. SAT-01274, File No. SAT-STA-20170921-00135 (Oct. 6, 2017) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01243, SAT-LOA-20160915-00089 (June 9, 2017) (Public Notice). During the drift from 84.55° E.L. to 18.0° W.L., only the satellite's TT&C frequencies will be utilized.

Ms. Marlene H. Dortch
November 15, 2017
Page 2

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

During the IOT of Intelsat 37e, Intelsat will continue to 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 ongoing with several operators of such satellites to resolve potential interference issues. Additionally, Intelsat is internally coordinating the proposed testing with potentially affected Intelsat satellites. Intelsat expects to complete coordination discussions before IOT of the Intelsat 37e satellite commences. 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 84.55° E.L. Intelsat 37e 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 Federal Communications Commission ("FCC") licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 37e at 84.55° E.L. In addition, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 37e at 84.55° E.L. that is the subject of an International Telecommunications Union ("ITU") filing and that is either in orbit or progressing towards launch.

The IOT of Intelsat 37e's C-, Ku-, and Ka-band payloads at 84.55° E.L. is a critical step in ensuring that the satellite will be fully operational at 18.0° W.L. This, in turn, will provide additional capacity to customers at the 18.0° W.L. location, and thereby promotes the public interest.

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

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Stephen Duall
Jay Whaley
Cindy Spiers