

S2610 SAT-STA-20171117-00157 IB2017003237  
ES 172 LLC  
EUTELSAT 172A



File # SAT-STA-20171117-00157

Call Sign S2610 Grant Date 11/21/17  
(or other identifier)

Term Dates period of  
From 11/22/17 To: 30 days

Approved by OMB  
3060-0678

Approved: Stephen J. Duall

Stephen J. Duall  
Chief, Satellite Policy Branch

\*with conditions

Date & Time Filed: Nov 17 2017 11:06:33:913AM  
File Number: SAT-STA-20171117-00157  
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:  
STA Request to Drift EUTELSAT 172A from 172 Deg. E.L. to 174 Deg. E.L.


1. Applicant

<b>Name:</b>	ES 172 LLC	<b>Phone Number:</b>	+65 6808 2088
<b>DBA Name:</b>		<b>Fax Number:</b>	+65 6808 2089
<b>Street:</b>	8 Temasek Boulevard #15-02 Suntec Tower 3	<b>E-Mail:</b>	kloke@eutelsat.com
<b>City:</b>	Singapore 038988	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20037 -
<b>Attention:</b>	Mr Ken Loke		

**ATTACHMENT TO GRANT**  
**ES 172 LLC**  
**IBFS File No. SAT-STA-20171117-00157**

<b>IBFS File No(s):</b>	SAT-STA-20171117-00157	<p><b>GRANTED – With Conditions</b></p>  <p><b>International Bureau Satellite Division</b></p>
<b>Licensee/Grantee:</b>	ES 172 LLC (Eutelsat)	
<b>Call Sign:</b>	S2610	
<b>Satellite Name:</b>	EUTELSAT 172A	
<b>Orbital Location: (required station-keeping tolerance)</b>	See Scope of Grant, below	
<b>Administration:</b>	United States of America	
<b>Nature of Service:</b>	Telemetry, Tracking and Command	
<b>Scope of Grant:</b>	Special temporary authority (STA) for a period of 30 days to conduct telemetry, tracking, and command operations associated with the drift the EUTELSAT 172A space station from the 172° E.L. orbital position to the 174° E.L. orbital location.	
<b>Frequencies:</b>	TT&C center frequencies at: 5926.5 MHz (Earth-to-space) 3703.5 MHz, 4199.5 MHz, 11199 MHz, and 12749 MHz (space-to-Earth)	
<p><b>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:</b></p> <ol style="list-style-type: none"> <li>1. Operations pursuant to this special temporary authority must be on an unprotected and non-harmful interference basis, i.e., the EUTELSAT 172A space station must not cause harmful interference to, and must not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, Eutelsat must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.</li> <li>2. Eutelsat must coordinate the operations of EUTELSAT 172A with existing geostationary space stations to ensure that no unacceptable interference results from its operations during drift to the 174 ° E.L. orbital location.</li> <li>3. Eutelsat must operate only the TT&amp;C frequencies on EUTELSAT 172A during the space station’s drift from the 172° E.L. orbital location to the 174° E.L. orbital location.</li> <li>4. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Eutelsat’s own risk.</li> </ol>		
<p>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.</p> <p>This action is issued pursuant to Section 0.261 of the Commission’s rules on delegated authority, 47 C.F.R. § 2.106, and is effective immediately. Petitions for reconsideration under Section 1.106 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 date of the public notice indicating that this action was taken.</p> <p>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).</p>		
<b>Action Date:</b>	November 21, 2017	

**ATTACHMENT TO GRANT**  
ES 172 LLC  
IBFS File No. SAT-STA-20171117-00157

<b>Term Dates</b>	<b>From:</b> November 22, 2017	<b>To:</b> Period of 30 days
<b>Approved:</b>  Stephen J. Duall Chief, Satellite Policy Branch		

2. Contact

<b>Name:</b>	Carlos M Nalda	<b>Phone Number:</b>	+1 571 332 5626
<b>Company:</b>	LMI Advisors, LLC	<b>Fax Number:</b>	+1 202 697 5037
<b>Street:</b>	2550 M Street NW Suite 345	<b>E-Mail:</b>	cnalda@lmiadvisors.com
<b>City:</b>	Washington	<b>State:</b>	DC
<b>Country:</b>	USA	<b>Zipcode:</b>	20037 -
<b>Attention:</b>		<b>Relationship:</b>	Other

(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

174 Deg. E.L.

7. Requested Extended Expiration Date

2017-12-15 00:00:00.0

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.)

STA Request to Drift EUTELSAT 172A from 172 Deg. E.L. to 174 Deg. 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  
Ken Loke

11. Title of Person Signing  
President

12. Please supply any need attachments.

Attachment 1: STA Narrative

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.**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of Application of	)	
	)	
ES 172 LLC	)	File No. SAT-STA-_____
	)	Call Sign S2610
For Special Temporary Authority to Drift	)	
EUTELSAT 172A from 172° E.L. to 174° E.L.	)	

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

ES 172 LLC, an indirect, wholly owned subsidiary of Eutelsat S.A. (“Eutelsat”), pursuant to Section 25.120(a) of the Commission’s rules, respectfully requests Special Temporary Authority (“STA”) beginning November 22, 2017, or as soon as practicable thereafter, to drift EUTELSAT 172A satellite (Call Sign S2610) from the 172° East Longitude (“E.L.”) orbital location to the 174° E.L. orbital location. ES 172 LLC will shortly file a separate request for authority to operate EUTELSAT 172A at the 174° E.L. orbital location that will enable the satellite to supplement available capacity in the Asia-Pacific region to satisfy, among other things, urgent U.S. government communications requirements.

ES 172 LLC is the licensee of the EUTELSAT 172A satellite and, together with its Eutelsat affiliates, operates the satellite’s communications payloads to support a wide range of traditional fixed-satellite service (“FSS”) and satellite mobility applications throughout the Asia-Pacific region. The Commission recently granted ES 172 LLC an STA to operate the C-band and Ku-band payloads on EUTELSAT 172B, a new satellite constructed and launched under authority issued by the government of France, as a replacement for EUTELSAT 172A.<sup>1</sup> This STA grant

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<sup>1</sup> See File No. SAT-STA-20171104-00149, Call Sign S3021 (granted Nov. 16, 2017). ES 172 LLC’s application for long-term commercial authority for the EUTELSAT 172B satellite payloads remains pending. See File No. SAT-RPL-20170927-00136, Call Sign S3021.

allows EUTELSAT 172A, a satellite specifically designed to provide services in the Asia-Pacific region, to be immediately redeployed to the adjacent 174° E.L. orbital location.

During the drift of EUTELSAT 172A from 172° E.L. to 174° E.L. and until the Commission grants authority to operate the satellite's communications payloads at the new location, the satellite will utilize only TT&C frequencies.<sup>2</sup> The specific TT&C frequencies (beacon) to be used are as follows:

C-band Uplink  
5926.5 MHz (H)

C-band Downlink  
3703.5 (H)  
4199.5 (V)

A Ku-band beacon will also be functional:

Ku-band Downlink  
11199 (R)  
12749 (L)

These TT&C operations will be on an unprotected, non-harmful interference basis only and Eutelsat will follow industry practices for coordinating physical operation of the satellite and TT&C transmissions during the satellite drift process.

In connection with the proposed drift, Eutelsat has assessed and limited the probability of the satellite becoming a source of debris as a result of collision with large debris or other operational space stations. EUTELSAT 172A will not be located at or pass through an orbital location that contains another active geostationary satellite and, other than EUTELSAT 172B at

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<sup>2</sup> Because this STA request proposes operation of TT&C frequencies only, a complete Schedule S is not submitted herewith. Instead, full operational information for the EUTELSAT 172A satellite, including complete Schedule S data, will be submitted with the application to operate the satellite at the 174° E.L. orbital location.



172° E.L. (the location which EUTELSAT 172A is vacating), there are no satellites with an overlapping station-keeping volume.

Grant of this STA request is in the public interest because it will facilitate efficient use of a U.S.-licensed satellite to help meet urgent U.S. government service requirements in the Asia-Pacific region. Furthermore, grant will not increase the potential for interference from EUTELSAT 172A operations because the satellite will operate only the above-listed TT&C frequencies during the drift. Finally, ES 172 LLC expressly acknowledges that grant of the requested STA is without prejudice to Commission consideration of any request for operating authority at 174° E.L., and that all actions taken in reliance on any grant of this STA request are at ES 172 LLC's sole risk.

For the reasons set forth herein, ES 172 LLC respectfully requests that the Commission grant this request to drift the EUTELSAT 172A satellite from the 172° E.L. orbital location to the 174° E.L. orbital location at the earliest practicable time.