

S3023 SAT-STA-20190715-00061 IB2019002704
Intelsat License LLC
Intelsat 39



*with conditions

File # SAT-STA-20190715-00061
Call Sign S3023 Grant Date 08/01/19
(or other identifier)
Term Dates period of
From 08/23/19 To: 30 days
Approved: *Stephen J. Duall*
Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060-0678

Date & Time Filed: Jul 15 2019 4:23:40:873PM
File Number: SAT-STA-20190715-00061
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 Conduct In-orbit Testing of the Intelsat 39 Satellite, Call Sign S3023

1. Applicant

| | | | |
|-------------------|--|----------------------|-----------------------------|
| Name: | Intelsat License LLC | Phone Number: | 703-559-7848 |
| DBA Name: | | Fax Number: | 703-559-8539 |
| Street: | c/o Intelsat US LLC 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-20190715-00061

| | | |
|---|---|---|
| IBFS File No(s): | SAT-STA-20190715-00061 | <p>GRANTED – With Conditions</p>  <p>International Bureau Satellite Division</p> |
| Licensee/Grantee: | Intelsat License LLC | |
| Call Sign: | S3023 | |
| Satellite Name: | Intelsat 39 | |
| Orbital Location: (required station-keeping tolerance) | 55.3° E.L./ 62.0° E.L. (+/-0.05 degrees east/west) | |
| Administration: | United States of America | |
| Nature of Service: | Fixed-Satellite Service (FSS) | |
| Scope of Grant: | Special temporary authority for a period of 30 days to: (1) conduct in-orbit testing (IOT) of Intelsat 39 at the 55.3° E.L. orbital location; (2) perform Telemetry, Tracking, and Command (TT&C) operations necessary to maintain Intelsat 39 at 55.3° E.L. and drift Intelsat 39 to its authorized orbital location at 62.0° E.L. upon completion of IOT; and (3) perform further IOT at the 62.0° E.L. orbital location. | |
| Service Area(s): | Not Applicable | |
| Frequencies: | Payload testing frequencies: 3625-4200 MHz (space-to-Earth) 5850-6425 MHz (Earth-to-space) 10.7-11.7 GHz (space-to-Earth) 12.25-12.75 GHz (space-to-Earth) 13.0-13.25 GHz (Earth-to-space) 13.75-14.5 GHz (Earth-to-space) ¹ TT&C frequencies: 3948.5 MHz, 3949.0 MHz, 3951.0 MHz, 3953.0 MHz, and 3953.5 MHz (space-to-Earth); and 6174.7 MHz and 6177.3 MHz (Earth-to-space) | |
| <p>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:</p> <ol style="list-style-type: none"> 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 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 39 with existing geostationary space stations to ensure that no unacceptable interference results from its operations at the 55.3° E.L. orbital location or during drift from the 55.3° E.L. orbital location to the 62.0° E.L. orbital location. | | |

¹ IOT payload testing of 3625-4200 MHz, 5850-6425 MHz, 10.7-10.95 GHz, 11.2-11.45 GHz, 11.45-11.7 GHz, 12.25-12.75 GHz, 13.0-13.25 GHz, 13.75-14.0 GHz, and 14.25-14.5 GHz will occur at 55.3° E.L. and IOT payload testing of 10.95-11.2 GHz and 14.0-14.25 GHz will occur at 62.0° E.L. See Request for Special Temporary Authority to Conduct In-Orbit Testing of the Intelsat 39 Satellite, IBFS File No. SAT-STA-20190715-00061, filed July 15, 2019. See also Letter from Cynthia J. Grady, Senior Counsel, Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC (filed July 26, 2019) (updating the launch date to August 6, 2019 and the requested commencement of IOT date to August 23, 2019 and providing further information on the IOT frequencies).

ATTACHMENT TO GRANT
Intelsat License LLC
IBFS File No. SAT-STA-20190715-00061

4. Intelsat 39's operations at the 55.3° 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 39 during the space station's drift from the 55.3° E.L. orbital location to the 62.0° E.L. orbital location.
6. During in-orbit testing, Intelsat must maintain the Intelsat 39 space station within an east-west longitudinal station-keeping tolerance of ± 0.05 degrees of the 55.3° E.L. and 62.0° E.L. orbital locations.
7. IOT operations for Intelsat 39 must comply with the conditions imposed in IBFS File No. SAT-LOA-20171205-00164.²

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 1, 2019 | |
| Term Dates | From: August 23, 2019 | To: period of 30 days |

Approved:


Stephen J. Duall
Chief, Satellite Policy Branch

² See Application for Authority to Launch and Operate Intelsat 39, a Replacement Satellite With New Frequencies, at 62.0° E.L., IBFS File No SAT-LOA-20171205-00164 (Grant stamp, June 26, 2018).

2. Contact

| | | | |
|-------------------|-----------------------|----------------------|----------------------------|
| Name: | Cynthia J. Grady | Phone Number: | 703-559-6949 |
| Company: | Intelsat US LLC | 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 a grant of Special Temporary Authority for 30 days, beginning August 10, 2019, to conduct in-orbit testing of the Intelsat 39 satellite (Call Sign S3023) at 55.3 E.L. to drift the satellite to its permanent location of 62.0 E.L. and to conduct additional in-orbit testing at 62.0 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
Cynthia J. Grady

11. Title of Person Signing
Senior Counsel, Intelsat US LLC

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.

July 15, 2019

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 the Intelsat 39 Satellite; Call Sign S3023

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, beginning August 10, 2019, to conduct in-orbit testing (“IOT”) of the Intelsat 39 satellite at 55.3° E.L., to drift the satellite to its permanent location of 62.0° E.L.,² and to conduct additional IOT at 62.0° E.L. Intelsat 39 is scheduled to be launched on July 24, 2019. The IOT and drift are expected to last approximately 60 days.

Intelsat 39 IOT payload testing will be performed in the following frequency bands:

- 3625-4200 MHz, 10700-11700 MHz and 12250-12750 MHz (space-to-Earth); and
- 5850-6425 MHz, 13000-13250 MHz, and 13750-14500 MHz (Earth-to-space).³

Telemetry, Tracking, and Command (“TT&C”) services during IOT and drift will be performed in the following center frequencies:

- 3948.5 MHz, 3949.0 MHz, 3951.0 MHz, 3953.0 MHz, and 3953.5 MHz (space-to-Earth); and
- 6174.7 MHz and 6177.3 MHz (Earth-to-space).

¹ Intelsat has filed this STA request, an FCC Form 159, and a \$980.00 filing fee electronically via the International Bureau's Filing System.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-01326, File No. SAT-LOA-20171205-00164 (June 29, 2019) (Public Notice). During the drift from 164.2° E.L. to 169.0° E.L., only the satellite's TT&C frequencies will be utilized.

³ IOT payload testing of 3625-4200 MHz, 10700-10950 MHz, 11200-11450 MHz, 11450-11700 MHz and 12250-12750 MHz will occur at 55.3° E.L. and IOT payload testing of 10950-11200 MHz and 14000-14250 MHz will occur at 62.0° E.L.

Ms. Marlene H. Dortch
July 15, 2019
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In support of its request, Intelsat submits the following information.

During the IOT of Intelsat 39, Intelsat will operate in the above referenced C- and Ku-bands. Intelsat has identified the operational satellites within +/-6 degrees of both IOT locations. Coordination is ongoing with several operators to resolve potential interference issues. Intelsat expects to complete coordination discussions before launch of the Intelsat 39 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 55.3° E.L. Intelsat 39 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 ("Commission") licensed system, or any other system applied for and under consideration by the Commission, having an overlapping station-keeping volume with Intelsat 39 at 55.3° E.L. In addition, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 39 at 55.3° E.L. that is the subject of an International Telecommunications Union filing and that is either in orbit or progressing towards launch.

The IOT of Intelsat 39 is a critical step in ensuring that the satellite will be fully operational at 62.0° E.L. This, in turn, will provide continuity of service to customers at the 62.0° 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
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Cindy Spiers



July 26, 2019

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 the
Intelsat 39 Satellite; Call Sign S3023
File No. SAT-STA-20190715-00061

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein supplements its above referenced request to update both the requested commencement date and launch date, and to clarify the in-orbit testing locations. Specifically, Intelsat updates the requested commencement date of its request to **August 23, 2019** and the launch date to **August 6, 2019**. Additionally, Intelsat clarifies that payload testing of 5850-6425 MHz, 13000-13250 MHz, and 13750-14000 MHz will occur at 55.3° E.L. All other information in the request remains unchanged.

Please direct any further questions regarding this supplement to the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Cindy Spiers