

S2405 SAT-STA-20190812-00073 IB2019002958
Intelsat License LLC
Intelsat 901



File # SAT-STA-20190812-00073

Call Sign S2405 Grant Date 09/12/19
(or other identifier)

Term Dates period of
From 08/16/19 To: 30 days

Approved by OMB
3060-0678

Approved: Stephen J. Duall

*with conditions

Stephen J. Duall
Chief, Satellite Policy Branch

Date & Time Filed: Aug 12 2019 2:33:52:030PM
File Number: SAT-STA-20190812-00073
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 Futher Extension of 30-day STA to Operate Intelsat 901 at 29.5 W.L. with New Frequencies (Call Sign S2405)

I. 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-20190812-00073

IBFS File No(s):	SAT-STA-20190812-00073	<p>GRANTED – With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	Intelsat License LLC	
Call Sign:	S2405	
Satellite Name:	Intelsat 901	
Orbital Location: (required station-keeping tolerance)	29.5° W.L. (+/- 0.05 degrees east-west station keeping)	
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 continue to operate Intelsat 901 in the communications frequencies 3625-3700 MHz and 5850-5925 MHz to provide additional capacity at 29.5° W.L..	
Service Area(s):	N/A	
Frequencies:	3625-4200 MHz (space-to-Earth) 5850-6425 MHz (Earth-to-space)	

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. Intelsat must maintain the Intelsat 901 space station at the 29.5° W.L. orbital location with an east/west longitudinal station-keeping tolerance of ± 0.05 degrees.
2. Intelsat must operate the Intelsat 901 space station at the 29.5° W.L. orbital location in compliance with all existing or future coordination agreements for that location. In the absence of a coordination agreement, such communications must comply with applicable provisions of the ITU Radio Regulations as the Commission cannot guarantee the success of the required coordination.
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. The operations of Intelsat 901 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 29.5° W.L. orbital location. Intelsat must also comport with the maximum power limits indicated in existing or future coordination agreements at 29.5° 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 29.5° W.L. involving approved communications with U.S.-licensed earth stations.
5. Intelsat's use of the 3625-3650 MHz (space-to-Earth) frequency band is subject to footnote US107, which limits FSS operations within the United States in the 3600-3650 MHz band on a primary basis to earth stations authorized prior to, or granted as a result of an application filed prior to, July 23, 2015 and constructed within 12 months of initial authorization. Additionally, applications filed after July 23, 2015 to modify these earth stations will not be accepted except for changes in polarization, antenna orientation, or ownership; and increases in antenna size for interference mitigation purposes. All other Fixed-Satellite Service earth station operations in the 3625-3650 MHz band must be on a secondary basis.
6. Communications between U.S.-licensed earth stations and Intelsat 901 in the 3625-3650 MHz (space-to-Earth) frequency band are subject to footnote US245 of the United States Table of Frequency Allocations, 47 CFR § 2.106, US245, which states that the use of non-Federal Fixed-Satellite Service in the 3600-3650 MHz band is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis.

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7. Communications between U.S. licensed earth stations and the Intelsat 901 space station in the 3650-3700 MHz (space-to-Earth) frequency band are subject to footnote NG185 of the United States Table of Frequency Allocations, 47 CFR § 2.106, NG185, which states that the use of the non-Federal Fixed-Satellite Service in the 3650-3700 MHz band is limited to international inter-continental systems.
8. Communications between U.S. licensed earth stations and the Intelsat 901 space station in the 3650-3700 MHz (space-to-Earth) frequency band are subject to footnote NG169 of the United States Table of Frequency Allocations, 47 CFR § 2.106, NG169, which states that after December 1, 2000, operations on a primary basis by the Fixed-Satellite Service (space-to-Earth) in the 3650-3700 MHz frequency band shall be limited to grandfathered earth stations. All other Fixed-Satellite Service earth station operations in the 3650-3700 MHz frequency band shall be on a secondary basis.
9. Operations of Intelsat 901 in the 5850-5925 MHz (Earth-to-space) frequency band are subject to the terms of footnote US245 to the United States Table of Frequency Allocations, 47 CFR § 2.106, US245, which limits the use of the non-Federal Fixed-Satellite Service in this band to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis. Intelsat must not claim protection from radiolocation transmitting stations operating in accordance with footnote G2.¹

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 CFR § 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:	September 12, 2019
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Term Dates	From: August 16, 2019	To: period of 30 days
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Approved:



Stephen J. Duall
Chief, Satellite Policy Branch

¹ For technical information of these radiolocation systems, see NTIA Report 83-115, Spectrum Resource Assessment in the 5650-5925 MHz Band, and NTIA Report 00-373, Measured Occupancy of 5850-5925 MHz and Adjacent 5-GHz Spectrum in the United States at <http://www.its.bldrdoc.gov/pub/pubs.php>.

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 an additional 30 days of Special Temporary Authority previously granted to Intelsat to operate Intelsat 901 (S2405) in the communications frequencies 3625-3700 MHz and 5850-5925 MHz in order to provide additional capacity at 29.5 W.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.

August 12, 2019

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

Re: Request for Further Extension of Special Temporary Authority to Operate Intelsat 901 at 29.5° W.L. with New Frequencies; Call Sign: S2405

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat to operate Intelsat 901 (Call Sign S2405) in the communications frequencies 3625-3700 MHz and 5850-5925 MHz in order to provide additional capacity at 29.5° W.L.² The operations are expected to continue until Intelsat 901 redeploys to 97.5° W.L.³

Intelsat 901 is permanently licensed to operate at 29.5° W.L. in the following bands: 3700-4200 MHz, 5925-6425 MHz, 10950-11200 MHz, 11450-11700 MHz, and 14000-14500 MHz.⁴ Intelsat is seeking authority to continue to operate in 3625-3700 MHz and 5850-5925 MHz. This will allow Intelsat to continue serving customers in these frequency bands.

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, e.g., *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01402, File No. SAT-STA-20190711-00060 (July 19, 2019) (Public Notice).

³ See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01397, File No. SAT-MOD-20190207-00009 (June 21, 2019) (Public Notice).

⁴ See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01290, File No. SAT-MOD-20170831-00126 (Dec. 15, 2017) (Public Notice). Although Intelsat 901 is capable of operating in the 3625-3700 MHz and 5850-5925 MHz bands, Intelsat did not originally seek authority to operate in these bands at 29.5° W.L.

Ms. Marlene H. Dortch
August 12, 2019
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Additionally, Intelsat is seeking to continue to operate under No. 4.4 of the International Telecommunication Union (“ITU”) Radio Regulations.⁵ Intelsat has assessed the operational environment near 29.5° W.L. and there are currently no co-frequency operations in 3625-3700 MHz and 5850-5925 MHz within +/- 6 degrees. Intelsat’s continued operation of Intelsat 901 will be on a non-interference, non-protection basis and will conform with the Federal Communications Commission’s (“Commission”) rules governing operations vis-à-vis adjacent locations.

Later this year Intelsat will replace Intelsat 901 with Intelsat 904 (Call Sign S2408) at 29.5° W.L. and will redeploy Intelsat 901. Intelsat is currently drifting Intelsat 904 to 29.5° W.L. and the spacecraft is expected to arrive at 29.5° W.L. in approximately three months.⁶

The temporary operation of Intelsat 901 in the 3625-3700 MHz and 5850-5925 MHz bands will help provide additional capacity for customers at the nominal 29.5° W.L. location. Accordingly, grant of this further STA extension request is in the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this further STA extension request. Please direct any questions regarding this request to (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Cindy Spiers

⁵ The U.S. submitted an ITU filing on Intelsat’s behalf in April 2019, which has been designated USASAT-55P. *See generally Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01405, File No. SAT-MOD-20190422-00031 (August 2, 2019) (Public Notice) (requesting that a new U.S. ITU filing be made at 29.5° W.L. for operations in the 3625-3700 MHz and 5850-5925 MHz bands).

⁶ *See, e.g., Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01404, File No. SAT-STA-20190717-00064 (July 26, 2019) (Public Notice); *see also Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01405, File No. SAT-MOD-20190422-00031 (August 2, 2019) (Public Notice).