### **EXHIBIT A**

# FREQUENCY COORDINATION AND INTERFERENCE ANALYSIS REPORT

Prepared for

INTELSAT, LLC HAGERSTOWN 31, MARYLAND

Satellite Earth Station

Prepared By: COMSEARCH 19700 JANELIA FARM BOULEVARD ASHBURN, VIRGINIA 20147 MARCH 2, 2004

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#### 1. CONCLUSIONS

An interference study considering all existing, proposed and prior coordinated microwave facilities within the coordination contours of the proposed earth station demonstrates that this site will operate satisfactorily with the common carrier microwave environment. Further, there will be no restrictions of its operation due to interference considerations.

#### 2. SUMMARY OF RESULTS

A number of great circle interference cases were identified during the interference study of the proposed earth station. Each of the cases, which exceeded the interference objective on a line-of-sight basis, was profiled and the propagation losses estimated using NBS TN101 (Revised) techniques. The losses were found to be sufficient to reduce the signal levels to acceptable magnitudes in every case.

The following companies reported potential great circle interference conflicts that did not meet the objectives on a line-of-sight basis. When over-the-horizon losses are considered on the interfering paths, sufficient blockage exists to negate harmful interference from occurring with the proposed transmit-receive earth station.

#### Company

Hardy Cellular Telephone Company Vanguard Cellular Pennsylvania, LLC Cellco Partnership – Pa. Region

No Other Carriers Reported Potential Interference Cases.

#### 3. SUPPLEMENTAL SHOWING

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations.

Coordination data for this earth station was sent to the below listed carriers with a letter dated January 27, 2004.

#### Company

ACC Pennsylvania License, LLC ACCELACOM-BALTIMORE LLC ALBEMARLE COUNTY POLICE DEPARTMENT ALLENTOWN SMSA LIMITED PARTNERSHIP AT&T COMMUNICATIONS OF MARYLAND INC AT&T COMMUNICATIONS OF PENNSYLVANIA, INC AT&T COMMUNICATIONS OF VIRGINIA INC Alltel Communications of Virginia, Inc. **Bucks County Dept of Emergency Comm** CELLCO PARTNERSHIP - NEWARK-DALLAS-ROUTE CELLCO PARTNERSHIP - VIRGINIA CELLCO PARTNERSHIP- PA REGION CHARLOTTESVILLE CELLULAR PARTNERSHIP CHARTER COMMUNICATIONS VI, LLC. COMMONWEALTH OF PENNSYLVANIA, RADIO PROJ. CORBAN COMMUNICATIONS INC. CROWN COMMUNICATION, INC. County of Berks DAUPHIN COUNTY EMERGENCY MANAGEMENT EASTERBROOKE CELLULAR CORPORATION **Enoch Pratt Free Library GANNETT COMPANY INC** GEORGE MASON UNIVERSITY INSTR FNDTION HARDY CELLULAR TELEPHONE COMPANY Intermedia Services, LLC. JUNIATA COUNTY OF LANCASTER COUNTY OF LB Tower Company LLC LOUDOUN COUNTY GOVERNMENT Local Communications Network, Inc. MARYLAND PUBLIC BROADCATING COMMISSION MARYLAND, STATE OF MIEMSS COMMUNICATIONS

MOBILE SATELLITE COMMUNICATIONS INC

MCI Network Services, Inc.

NATIONAL RADIO ASTRONOMY OBSERVATORY **NEWCOM 9-1-1** ORBCOMM GLOBAL LP PENNSYLVANIA MICROWAVE NETWORK INC. PENNSYLVANIA TURNPIKE COMMISSION PITTSBURGH CELLULAR TELEPHONE COMPANY PITTSBURGH CITY TELECOM BUREAU PITTSBURGH SMSA LIMITED PARTNERSHIP PUBLIC BROADCASTING SERVICE Peco Energy Company Philly Sports Wireless SCHUYLKILL COUNTY PUBLIC SAFETY 911 SOUTHWESTERN BELL MOBILE SYS LLC - DC TELIGENT INC. UNIVERSITY OF MARYLAND ITV SYSTEM USCOC OF CUMBERLAND, INC. VIRGINIA RSA #7, INC. Vanguard Cellular Pennsylvania, LLC Verizon New Jersey, Inc. Verizon Virginia, Inc. WHYY, INC. WINEMILLER COMMUNICATIONS, INC. WINSTAR WIRELESS FIBER CORPORATION

Warrenton Fauquier Joint Communications

#### A FARTH STATION COORDINATION DATA

4. EARTH STATION COORDINATION DATA
This section presents the data pertinent to frequency coordination of the proposed earth station that was circulated to all carriers within its coordination contours.

Date:

01/27/2004

Job Number:

**Administrative Information** 

Status

**ENGINEER PROPOSAL** 

Call Sign

Licensee Code

INTELS

Licensee Name

INTELSAT, LLC

Site Information

HAGERSTOWN31, MARYLAND

Venue Name

Latitude (NAD 83) Longitude (NAD 83) Climate Zone 39° 35' 59.7" N 77° 45' 30.8" W

Rain Zone

A 2

Ground Elevation (AMSL)

171.91 m / 564.0 ft

**Link Information** 

Satellite Type

Geostationary

Mode

TR - Transmit-Receive

Modulation

Digital

Satellite Arc

6° W to 143° West Longitude

Azimuth Range Corresponding Elevation Angles

101.9° to 253.6° 5.3° / 10.3°

Antenna Centerline (AGL)

3.05 m / 10.0 ft

Antenna Informatio Manufacturer Model Gain / Diameter 3-dB / 15-dB Beamwidt		Receive Vertex/RSI 4.8 KPK 53.5 dBi / 4.8 m 0.34° / 0.72°		<b>Transmit</b> Vertex/RSI 4.8 KPK 55.2 dBi / 4.8 m 0.28° / 0.59°	
Max Available RF Power	(dBW/4 kHz) (dBW/MHz)			-14.0 10.0	
Maximum EIRP	(dBW/4 kHz) (dBW/MHz) (dBW)			41.2 65.2 79.0	
Interference Objectives:	Long Term Short Term	-156.0 dBW/MHz -146.0 dBW/MHz	20% 0.01%	-151.0 dBW/4 kHz 20% -128.0 dBW/4 kHz 0.0025	

Frequency	Information

Receive 11.0 GHz

Transmit 14.0 GHz

Emission / Frequency Range (MHz)

43K8G7W - 72M0G7W / 10950.0 - 11200.0

43K8G7W - 72M0G7W / 14000.0 - 14500.0 43K8G7W - 72M0G7W / 11450.0 - 12200.0

Max Great Circle Coordination Distance Precipitation Scatter Contour Radius 566.8 km / 352.1 mi 602.2 km / 374.2 mi 251.4 km / 156.2 mi 100.0 km / 62.1 mi **Coordination Values** 

**HAGERSTOWN 31, MD** 

Licensee Name Latitude (NAD 83) Longitude (NAD 83) Ground Elevation (AMSL) Antenna Centerline (AGL)

Antenna Model

INTELSAT, LLC 39° 35' 59.7" N 77° 45' 30.8" W 171.91 m / 564.0 ft 3.05 m / 10.0 ft Vertex/RSI 4.8 KPK

Antenna Mode Interference Objectives: Long Term Receive 11.0 GHz -156.0 dBW/MHz 20%

Transmit 14.0 GHz -151.0 dBW/4 kHz

20%

Short Term

-146.0 dBW/MHz 0.01%

-128.0 dBW/4 kHz

0.0025%

Max Available RF Power

-14.0 (dBW/4 kHz)

			Receive	e 11.0 GHz	Transr	nit 14.0 GHz
	Horizon	Antenna	Horizon	Coordination	Horizon	Coordination
Azimuth (°)	Elevation (°)	Discrimination (°)	Gain (dBi)	Distance (km)	Gain (dBi)	Distance (km)
0	0.34	101.82	-10.00	217.91	-10.00	104.80
5	0.25	96.84	-10.00	226.56	-10.00	111.94
10	0.21	91.86	-10.00	230.26	-10.00	114.92
15	0.21	86.88	-10.00	230.24	-10.00	114.90
20	0.00	81.90	-10.00	231.37	-10.00	115.80
25	0.20	76.92	-10.00	231.30	-10.00	115.75
30	0.20	71.94	-10.00	231.04	-10.00	115.54
35	0.00	66.97	-10.00	231.37	-10.00	115.80
40	0.00	62.00	-10.00	231.37	-10.00	115.80
45	0.00	57.03	-10.00	231.37	-10.00	115.80
50	0.00	52.06	-10.00	231.37	-10.00	115.80
55	0.00	47.10	-9.82	232.14	-9.82	116.24
60	0.00	42.14	-8.62	237.52	-8.62	119.26
65	0.00	37.19	-7.26	243.78	-7.26	122.68
70	0.00	32.26	-5.72	251.29	-5.72	126.62
75	0.00	27.35	-3.92	260.19	-3.92	130.01
80	0.00	22.47	-1.79	271.24	-1.79	135.88
85	0.00	17.66	0.83	285.48	0.83	143.83
90	0.00	12.98	4.17	301.98	4.17	155.17
95	0.00	8.66	8.56	332.92	8.56	173.17
100	0.00	5.61	13.27	566.79	13.27	251.39
105	0.00	6.15	12.28	420.51	12.28	195.99
110	0.00	9.60	7.45	324.46	7.45	168.95
115	0.00	13.27	3.93	300.47	3.93	154.30
120	0.00	16.89	1.31	288.17	1.31	145.38
125	0.00	20.41	-0.75	276.81	-0.75	138.95
130	0.00	23.83	-2.43	267.88	-2.43	134.07
135	0.00	27.11	-3.83	260.67	-3.83	130.26
140	0.00	30.23	-5.01	254.75	-5.01	128.44
145	0.00	33.14	-6.01	249.87	-6.01	125.87
150	0.00	35.81	-6.85	245.83	-6.85	123.72
155	0.00	38.20	-7.55	242.42	-7.55	121.94
160	0.00	40.26	-8.12	239.78	-8.12	120.50
165	0.00	41.92	-8.56	237.77	-8.56	119.40
170	0.00	43.16	-8.88	236.35	-8.88	118.61
175	0.00	43.92	-9.07	235.50	-9.07	118.13
180	0.00	44.17	-9.13	235.22	-9.13	117.97
185	0.00	43.92	-9.07	235.50	-9.07	118.13

**Coordination Values** 

HAGERSTOWN 31, MD

Licensee Name Latitude (NAD 83) Longitude (NAD 83) Ground Elevation (AMSL) Antenna Centerline (AGL)

Antenna Model

INTELSAT, LLC 39° 35' 59.7" N 77° 45' 30.8" W 171.91 m / 564.0 ft 3.05 m / 10.0 ft Vertex/RSI 4.8 KPK

Antenna Mode Interference Objectives: Long Term Receive 11.0 GHz -156.0 dBW/MHz 20% Transmit 14.0 GHz -151.0 dBW/4 kHz

20%

Short Term

-146.0 dBW/MHz 0.01%

-128.0 dBW/4 kHz

0.0025%

Max Available RF Power

-14.0 (dBW/4 kHz)

			Receiv	e 11.0 GHz	Transi	mit 14.0 GHz
	Horizon	Antenna	Horizon	Coordination	Horizon	Coordination
Azimuth (°)	Elevation (°)	Discrimination (°)	Gain (dBi)	Distance (km)	Gain (dBi)	Distance (km)
190	0.00	43.16	-8.88	236.35	-8.88	118.61
195	0.00	41.92	-8.56	237.77	-8.56	119.40
200	0.22	40.06	-8.07	237.66	-8.07	118.78
205	0.39	37.87	-7.46	224.66	-7.46	107.60
210	0.43	35.47	-6.75	224.34	-6.75	106.49
215	0.32	32.89	-5.93	238.05	-5.93	116.64
220	0.24	30.04	-4.94	250.92	-4.94	125.42
225	0.23	26.94	-3.76	257.51	-3.76	129.02
230	0.22	23.67	-2.35	265.63	-2.35	132.18
235	0.22	20.26	-0.67	275.00	-0.67	137.31
240	0.23	16.72	1.42	284.97	1.42	142.39
245	0.29	13.15	4.03	293.64	4.03	145.34
250	0.22	10.67	6.29	313.60	6.29	160.92
255	0.00	10.36	6.62	359.06	6.62	173.82
260	0.32	11.80	5.20	294.84	5.20	146.85
265	0.30	15.09	2.53	284.65	2.53	140.22
270	0.36	19.08	-0.01	263.96	-0.01	128.87
275	0.37	23.47	-2.26	251.59	-2.26	122.45
280	0.24	28.10	-4.22	254.61	-4.22	127.37
285	0.00	32.86	-5.92	250.32	-5.92	126.11
290	0.00	37.61	-7.38	243.20	-7.38	122.37
295	0.00	42.41	-8.69	237.20	-8.69	119.08
300	0.00	47.25	-9.86	231.98	-9.86	116.15
305	0.21	52.08	-10.00	230.85	-10.00	115.39
310	0.25	56.96	-10.00	226.03	-10.00	111.52
315	0.00	61.88	-10.00	231.37	-10.00	115.80
320	0.00	66.78	-10.00	231.37	-10.00	115.80
325	0.00	71.69	-10.00	231.37	-10.00	115.80
330	0.00	76.61	-10.00	231.37	-10.00	115.80
335	0.21	81.52	-10.00	230.79	-10.00	115.34
340	0.29	86.44	-10.00	223.06	-10.00	109.09
345	0.30	91.36	-10.00	221.33	-10.00	107.66
350	0.32	96.29	-10.00	219.58	-10.00	106.21
355	0.21	101.21	-10.00	230.81	-10.00	115.36

#### 5. CERTIFICATION

I HEREBY CERTIFY THAT I AM THE TECHNICALLY QUALIFIED PERSON RESPONSIBLE FOR THE PREPARATION OF THE FREQUENCY COORDINATION DATA CONTAINED IN THIS APPLICATION, THAT I AM FAMILIAR WITH PARTS 101 AND 25 OF THE FCC RULES AND REGULATIONS, THAT I HAVE EITHER PREPARED OR REVIEWED THE FREQUENCY COORDINATION DATA SUBMITTED WITH THIS APPLICATION, AND THAT IT IS COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Jeffrey E. Cowler

JEFFREY E. COWLES PRINCIPAL COMSEARCH 19700 JANELIA FARM BLVD. ASHBURN, VA 20147

DATED: MARCH 2, 2004

### **EXHIBIT B**

## Analysis of Non-Ionizing Radiation for a 4.8-Meter Earth Station System

This report analyzes the non-ionizing radiation levels for a 4.8-meter earth station system. The analysis and calculations performed in this report comply with the methods described in the FCC Office of Engineering and Technology Bulletin, No. 65 first published in 1985 and revised in 1997 in Edition 97-01. The radiation safety limits used in the analysis are in conformance with the FCC R&O 96-326. Bulletin No. 65 and the FCC R&O specifies that there are two separate tiers of exposure limits that are dependent on the situation in which the exposure takes place and/or the status of the individuals who are subject to the exposure. The Maximum Permissible Exposure (MPE) limits for persons in a General Population/Uncontrolled environment are shown in Table 1. The General Population/Uncontrolled MPE is a function of transmit frequency and is for an exposure period of thirty minutes or less. The MPE limits for persons in an Occupational/Controlled environment are shown in Table 2. The Occupational MPE is a function of transmit frequency and is for an exposure period of six minutes or less. The purpose of the analysis described in this report is to determine the power flux density levels of the earth station in the far-field, near-field, transition region, between the subreflector or feed and main reflector surface, at the main reflector surface, and between the antenna edge and the ground and to compare these levels to the specified MPEs.

Table 1. Limits for General Population/Uncontrolled Exposure (MPE)

Frequency Range (MHz)	Power Density (mW/cm²)
30-300	0.2
300-1500	Frequency (MHz)*(0.8/1200)
1500-100,000	1.0

Table 2. Limits for Occupational/Controlled Exposure (MPE)

Frequency Range (MHz)	Power Density (mW/cm²)
30-300	1.0
300-1500	Frequency (MHz)*(4.0/1200)
1500-100,000	5.0

Table 3. Formulas and Parameters Used for Determining Power Flux Densities

Parameter	Symbol	Formula	Value	Units
Antenna Diameter	D	Input	4.8	m
Antenna Surface Area	A <sub>surface</sub>	$\pi D^2/4$	18.10	m²
Subreflector Diameter	$D_{sr}$	Input	36.6	cm
Area of Subreflector	A <sub>sr</sub>	$\pi D_{sr}^2/4$	1052.09	cm <sup>2</sup>
Frequency	F	Input	14250	MHz
Wavelength	λ	300 / F	0.021053	m
Transmit Power	Р	Input	750.00	W
Antenna Gain (dBi)	$G_{es}$	Input	55.2	dBi
Antenna Gain (factor)	G	10 <sup>Ges/10</sup>	331131.1	n/a
Pi	π	Constant	3.1415927	n/a
Antenna Efficiency	η	$G\lambda^2/(\pi^2D^2)$	0.65	n/a

#### 1. Far Field Distance Calculation

The distance to the beginning of the far field can be determined from the following equation:

$$R_{\rm ff} = 0.60 \, D^2 / \lambda$$
 (1)  
= 656.6 m

The maximum main beam power density in the far field can be determined from the following equation:

$$S_{ff} = G P / (4 \pi R_{ff}^2)$$
 (2)  
= 45.835 W/m<sup>2</sup>  
= 4.583 mW/cm<sup>2</sup>

#### 2. Near Field Calculation

Power flux density is considered to be at a maximum value throughout the entire length of the defined Near Field region. The region is contained within a cylindrical volume having the same diameter as the antenna. Past the boundary of the Near Field region, the power density from the antenna decreases linearly with respect to increasing distance.

The distance to the end of the Near Field can be determined from the following equation:

$$R_{nf} = D^2 / (4 \lambda)$$
 (3)  
= 273.6 m

The maximum power density in the Near Field can be determined from the following equation:

$$S_{nf} = 16.0 \, \eta \, P / (\pi \, D^2)$$
  
= 106.999 W/m<sup>2</sup>  
= 10.700 mW/cm<sup>2</sup>

#### 3. Transition Region Calculation

The Transition region is located between the Near and Far Field regions. The power density begins to decrease linearly with increasing distance in the Transition region. While the power density decreases inversely with distance in the Transition region, the power density decreases inversely with the square of the distance in the Far Field region. The maximum power density in the Transition region will not exceed that calculated for the Near Field region. The power density calculated in Section 1 is the highest power density the antenna can produce in any of the regions away from the antenna. The power density at a distance  $R_t$  can be determined from the following equation:

$$S_t = S_{nf} R_{nf} / R_t$$
 (5)  
= 10.700 mW/cm<sup>2</sup>

#### 4. Region between the Main Reflector and the Subreflector

Transmissions from the feed assembly are directed toward the subreflector surface, and are reflected back toward the main reflector. The most common feed assemblies are waveguide flanges, horns or subreflectors. The energy between the subreflector and the reflector surfaces can be calculated by determining the power density at the subreflector surface. This can be determined from the following equation:

$$S_{sr} = 4000 P / A_{sr}$$
 (6)  
= 2851.473 mW/cm<sup>2</sup>

#### 5. Main Reflector Region

The power density in the main reflector is determined in the same manner as the power density at the subreflector. The area is now the area of the main reflector aperture and can be determined from the following equation:

$$S_{\text{surface}} = 4 \text{ P / A}_{\text{surface}}$$
 (7)  
= 165.786 W/m<sup>2</sup>  
= 16.579 mW/cm<sup>2</sup>

#### 6. Region between the Main Reflector and the Ground

Assuming uniform illumination of the reflector surface, the power density between the antenna and the ground can be determined from the following equation:

$$S_g = P / A_{surface}$$
 (8)  
= 41.447 W/m<sup>2</sup>  
= 4.145 mW/cm<sup>2</sup>

### 7. Summary of Calculations

Table 4. Summary of Expected Radiation levels for Uncontrolled Environment

Region	Radiation Pov	ed Maximum wer Density Lev W/cm²)	Hazard Assessment
1. Far Field (R <sub>ff</sub> = 656.6 m)	S <sub>ff</sub>	4.583	Potential Hazard
2. Near Field (R <sub>nf</sub> = 273.6 m)	S <sub>nf</sub>	10.700	Potential Hazard
3. Transition Region (R <sub>nf</sub> < R <sub>t</sub> < R <sub>ff</sub> )	St	10.700	Potential Hazard
Between Main Reflector and Subreflector	S <sub>sr</sub>	2851.473	Potential Hazard
5. Main Reflector	S <sub>surface</sub>	16.579	Potential Hazard
6. Between Main Reflector and Ground	$S_g$	4.145	Potential Hazard

Table 5. Summary of Expected Radiation levels for Controlled Environment

Region	Calculated Maximum Radiation Power Density Level (mW/cm²)		Hazard Assessment
1. Far Field (R <sub>ff</sub> = 656.6 m)	S <sub>ff</sub>	4.583	Satisfies FCC MPE
2. Near Field (R <sub>nf</sub> = 273.6 m)	$S_{nf}$	10.700	Potential Hazard
3. Transition Region (R <sub>nf</sub> < R <sub>t</sub> < R <sub>ff</sub> )	St	10.700	Potential Hazard
Between Main Reflector and Subreflector	S <sub>sr</sub>	2851.473	Potential Hazard
5. Main Reflector	S <sub>surfac</sub>	<sub>e</sub> 16.579	Potential Hazard
6. Between Main Reflector and Ground	$S_g$	4.145	Satisfies FCC MPE

It is the applicant's responsibility to ensure that the public and operational personnel are not exposed to harmful levels of radiation.

#### 8. Conclusions

Based upon the above analysis, it is concluded that harmful levels of radiation may exist in those regions noted for the Uncontrolled (Table 4) and Controlled (Table 5) Environments.

The antennas will be installed at the Intelsat, LLC facility in Hagerstown, Maryland. The facility is surrounded by a fence, which will restrict any public access. The earth stations will be marked with the standard radiation hazard warnings, as well as the area in the vicinity of the earth stations to inform those in the general population, who might be working or otherwise present in or near the direct path of the main beam.

The applicant will ensure that the main beam of the antennas will be pointed at least one diameter away from any building, or other obstacles in those areas that exceed the MPE levels. Since one diameter removed from the center of the main beam the levels are down at least 20 dB, or by a factor of 100, these potential hazards do not exist for either the public, or for earth station personnel.

Finally, the earth station's operating personnel will not have access to areas that exceed the MPE levels, while the earth station is in operation. The transmitter will be turned off during periods of maintenance, so that the MPE standard of 5.0 mw/cm\*\*2 will be complied with for those regions in close proximity to the main reflector, which could be occupied by operating personnel.

### **EXHIBIT C**

EXHIBIT C Page 1 of 1

#### **FAA Notification Not Required**

Per PART 17[17.14(a)] of the FCC rules, FAA notification is not required, as the antenna structure is located in an area with structures of equal or greater heights.

### **EXHIBIT D**

#### Exhibit D Response to Question 21

Intelsat LLC seeks to operate this earth station on both a common carrier and non-common carrier basis. However, the electronic response to Question 21 only permits an applicant to check one box. Accordingly, Intelsat LLC checked one box—the box marked non-common carrier—and submits this exhibit to make clear that both boxes—the box marked non-common carrier and the box marked common carrier—should be checked.