

October 29, 2015

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

> Re: Intelsat License LLC Application for Earth Station License Hagerstown, Maryland Earth Station E140121 File No. SES-LIC-20141124-00872

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat"), at the request of the staff of the International Bureau, herein supplements its above referenced pending application for a new earth station license at its Hagerstown, Maryland facility. Specifically, Intelsat is supplying additional frequency coordination and interference analysis reports, attached herewith as Exhibits I and J.

In addition, and to the extent necessary, Intelsat License LLC ("Intelsat") requests a waiver of Footnote NG52 of the United States Table of Allocations, 47 C.F.R. §2.106, to use the 10.7-11.7 GHz (space-to-Earth) frequency band to enable Intelsat to offer domestic services in the band using Intelsat 29e (Call Sign S2913), consistent with the waiver granted to the satellite.<sup>1</sup> Intelsat agrees to the conditions contained in the Intelsat 29e grant relating to the provision of domestic services in the 10.7-11.7 GHz band.

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

Sincerely,

Cynthia J. Grady /d' Cynthia J. Grady

Regulatory Counsel Intelsat Corporation

cc: Paul Blais Trang Nguyen

Intelsat Corporation

7900 Tysons One Place, McLean, VA 22102-5972 USA www.intelsat.com T +1 703-559-6800

<sup>&</sup>lt;sup>1</sup> See Policy Branch Information; Actions Taken, Report No. SAT-01086, File Nos. SAT-AMD-20140718-00087 and SAT-LOA-20130722-00097 (May 22, 2015) (Public Notice).

Exhibit I

# FREQUENCY COORDINATION AND INTERFERENCE ANALYSIS REPORT

Prepared for Intelsat License LLC HAGERSTOWN, MD (E140121) Satellite Earth Station

Prepared By: COMSEARCH 19700 Janelia Farm Boulevard Ashburn, VA 20147 October 27, 2015

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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 receive-only earth station.

#### <u>Company</u>

Maryland Public Broadcasting Commission State of Maryland, MIEMSS

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 10/06/2015.

Company 256Q Networks ALLEGANY COLLEGE OF MARYLAND ALLEGANY COUNTY GOVERNMENT AT&T Communications of Virginia, LLC AT&T Corporation AT&T Wireless Services 3 LLC (NM, N TX) AWC Networks Adams County Department of Emergency Svc Affiniti PA, LLC Airband Communications Inc Albermarle, County of, Virginia Allegheny County Dept of Emergency Svcs Allentown SMSA Limited Partnership Allfirst Bank Americell PA-3 LTD Anadarko Petroleum Corporation Argos Engineering, LLC Atlantic Broadband (Penn), LLC Auburn Data Systems, LLC BALTIMORE CITY DEPARTMENT OF PUBLIC WORK BAY BROADBAND COMMUNICATIONS LLC **BLAIR COUNTY 911** Baltimore County of Maryland Baltimore Gas and Electric Company Bedford, County of Believe Wireless, LLC Berkeley, County of Berks County Department of Emergency Ser Blaze Broadband Blue Ridge Carriers Blueline Communications **Buckeve Partners** Bucks County Dept. of Emergency Comm Buggs Island Telephone Cooperative, Inc. Business Only Broadband, LLC **CBS** Communication Services Inc CNG Transmission Corporation CONXX, Inc. CROWN COMMUNICATION, INC. Cambria, County of

Cellco Partnership - Bridgeville, PA/WV Cellco Partnership - Southern Virginia Cellco Partnership- PA Region Cellco Prtnrshp - Phil. Tri-State Rgn Central Virginia Electric Cooperative Chester, County of China Cat Productions LLC City of Bethlehem City of Laurel Citynet Clearwire Spectrum Holdings III, LLC Clearwire Spectrum Holdings LLC Columbia, County Commonwealth of Pennsylvania-Radio Proj. Comprehensive Wireless LLC Conterra Ultra Broadband, LLC Converge Towers LLC Coralinks County of Camden County of Lycoming County of York Cumberland, County of D&E Communications, Inc. DAUPHIN COUNTY EMERGENCY MANAGEMENT Delaware County (PA) Emergency Services **Delaware Division of Communications** ECW Wireless, LLC Eastern MLG LLC Eduro Networks LLC Electric Railroad, LLC Enoch Pratt Free Library Exelon Generation Company, LLC FELHC, INC FiberTower Network Services Corp.-DIP Forest, County of Franklin County Dept. of Emergency Servi Frederick County Fundamental Broadcasting LLC GEORGE MASON UNIVERSITY INSTR FNDTION GETWIRELESS.NET GWETA, Inc. Garden State Transmissions Globecomm License Sub LLC Gloucester, County of Grant, County of Gray Television Licensee LLC (Gray TV) Gray Television Licensee, LLC Greater Philadelphia Radio, Inc. Greene, County of (PA) HARRIS CORPORATION HENRICO COUNTY Hanover, County of Hardy Cellular Telephone Company Hardy Telecommunications Harrisonburg-Rockingham ECC High Voltage Communications LLC (CFN)

Hilltower Tower Leasing, Inc Huntingdon County of Indiana. County of JEFFERSON COUNTY OF PENNSYLVANIA Jefferson Microwave, LLC Juniata County Emergency Services Kent County Levy Court King George County Kryptick Technologies LOWER SHORE BROADBAND COOPERATIVE Lancaster County-Wide Communications Lehigh, County of Limitless Mobile, LLC Local Media TV Philadelphia Loudoun County Public Schools Loudoun, County of MB Microwave, LLC MIT LINCOLN LABORATORY MLS Engineering Maryland Port Administration Maryland Public Broadcasting Commission Maryland State Highway Administration Maryland, State Of - MDOT-MTA Maryland, State of - DNR Maryland, State of - Dept.of Info & Tech Micrologic, Inc Middle East Broadcasting Networks, Inc. Mifflin County Millersburg Area School District Mobile Satellite Communications Inc Montgomery County Of Montgomery, County of Morgan, County of NOROC Broadband LLC National Tower Company LLC Nelson, County of Netrepid, Inc. New Cingular Wireless PCS - Maryland New Cingular Wireless PCS LLC - DC New Cingular Wireless PCS LLC - Georgia New Cingular Wireless PCS LLC - VA New Cingular Wireless PCS LLC- WV/NC/SC New Cingular Wireless PCS LLC-DE/NH/RI New Cingular Wireless PCS of PA LLC New Cingular Wireless PCS, LLC - PA New Jersey Turnpike Authority-Pkwy Div New Line Networks, LLC Nextlink Wireless, LLC Norfolk Southern Railway Northern Virginia Electric Cooperative Northumberland, County of Old Dominion LLC PEG Bandwidth, LLC Page County Broadband Authority Peco Energy Company Pennsylvania 3 Sector 2, L.P. - PA Regn

Pennsylvania 4 Sector 2 LP- PA Region Pennsylvania Sports Entertainment Netwo. Pennsylvania Turnpike Commission Peoples Natural Gas Company LLC PhillieCo, L.P. Pitt Power Pitt Power Pittsburgh, City of (PA) Pontis Communications, Inc. Port Networks, LLC Prince William, County of Public Broadcasting Service QUALCOMM INC. RADIO ONE. INC - MD Radio One Inc RapidDSL & Wireless, Inc. Rendezvous Communications LLC **River Valley Internet LLC** Rural Broadband Network Services LLC SCHUYLKILL, COUNTY OF SCTF NET SECOM NET Salem County Information Technology Shenandoah Personal Communications, LLC Somerset County, Maryland Somerset, County of Southeastern Pennsylvania Transit Auth Southern Maryland Electric Cooperative I Spotsylvania, County of Sprint Spectrum L.P. Sprintcom, Inc St. Mary's County of (MD) Stafford, County of Standard Backhaul Communications LLC State of Maryland, MIEMSS State of New Jersev Sullivan, County of Sussex County Council **T-Mobile License LLC** TWO WAY RADIO INC. Telecom Transport Management, Inc Telegia Communications Inc. Thought Transmissions, LLC Towerstream Corp. Turtle Networks 6559 Turtle Networks 6562 USCOC of Cumberland, Inc. Union. County Of Valley Rural Electric Cooperative, Inc. Verizon New Jersey, Inc. Verizon Virginia, Inc. Verizon Wireless (VAW) LLC - Maryland Verizon Wireless (VAW) LLC - W/B/V Mkts Verizon Wireless (VAW) LLC-Pennsylvania Verizon Wireless VAW LLC-Southern VA Virginia Broadband, LLC

Virginia Electric & Power Company Virginia Everywhere, LLC Virginia PCS Alliance, L.C. Virginia Tech Foundation, Inc. WEST VIRGINIA RADIO CORPORATION WHYY, Inc. WICOMICO BOARD OF EDUCATION WPNT Media Subsidiary, LLC WV DHHR BPH, Office of EMS, Com. Div. Warrenton Fauquier Joint Communications Washington County Board of Education Washington Gas Light Company Washington Suburban Sanitary Commission Washington, County of Webline Holdings LLC West Virginia PCS Alliance, L.C. Western PA Internet Access, Inc. Wireless Internetwork LLC World Class Wireless, LLC iSignal xWave Engineering LLC

## 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.

Earth Station Data Sheet

Date: Job Number:	10/27/2015 151006COMSGE15
Administrative Information Status Call Sign Licensee Code Licensee Name	ENGINEER PROPOSAL E140121 INTELS Intelsat License LLC
<b>Site Information</b> Venue Name Latitude (NAD 83) Longitude (NAD 83) Climate Zone Rain Zone Ground Elevation (AMSL)	HAGERSTOWN, MD 39° 35' 53.1" N 77° 45' 22.3" W A 2 170.08 m / 558.0 ft
Link Information Satellite Type Mode Modulation Satellite Arc Azimuth Range Corresponding Elevation Angles Antenna Centerline (AGL)	Geostationary RO - Receive-Only Digital 49° W to 51° West Longitude 139.3° to 141.7° 35.4° / 36.5° 8.66 m / 28.4 ft
Antenna Information Manufacturer Model Gain / Diameter 3-dB / 15-dB Beamwidth	Receive - FCC32 Vertex/RSI 13.1 Meter 62.6 dBi / 13.1 m 0.10° / 0.26°
Interference Objectives: Long Terr Short Terr	
Frequency Information Emission / Frequency Range (MHz)	<b>Receive 11.0 GHz</b> 250KG7D - 1M00G7W / 10700.0 - 10950.0 250KG7D - 1M00G7W / 11200.0 - 11450.0 250KG7D - 1M00G7W / 11450.0 - 11700.0
Max Great Circle Coordination Distance Precipitation Scatter Contour Radius	246.4 km / 153.1 mi 478.1 km / 297.0 mi

#### Earth Station Data Sheet

Coordination Values	HAGERSTOWN, MD
Licensee Name	Intelsat License LLC
Latitude (NAD 83)	39° 35' 53.1" N
Longitude (NAD 83)	77° 45' 22.3" W
Ground Elevation (AMSL)	170.08 m / 558.0 ft
Antenna Centerline (AGL)	8.66 m / 28.4 ft
Antenna Model	Vertex/RSI 13.1 Meter
Antenna Mode	Receive 11.0 GHz
Interference Objectives: Long Terr	m -156.0 dBW/MHz 20%
Short Ter	m -146.0 dBW/MHz 0.01%

			Receive	e 11.0 GHz
	Horizon	Antenna	Horizon	Coordination
Azimuth (°)	Elevation (°)	Discrimination (°)	Gain (dBi)	Distance (km)
0	0.00	128.14	-10.00	231.37
5	0.00	124.68	-10.00	231.37
10	0.00	121.06	-10.00	231.37
15	0.00	117.32	-10.00	231.37
20	0.00	113.49	-10.00	231.37
25	0.00	109.58	-10.00	231.37
30	0.00	105.61	-10.00	231.37
35	0.00	101.59	-10.00	231.37
40	0.00	97.55	-10.00	231.37
45	0.00	93.48	-10.00	231.37
50	0.00	89.41	-10.00	231.37
55	0.00	85.34	-10.00	231.37
60	0.00	81.28	-10.00	231.37
65	0.00	77.24	-10.00	231.37
70	0.00	73.24	-10.00	231.37
75	0.00	69.28	-10.00	231.37
80	0.00	65.39	-10.00	231.37
85	0.00	61.59	-10.00	231.37
90	0.00	57.88	-10.00	231.37
95	0.00	54.30	-10.00	231.37
100	0.00	50.88	-10.00	231.37
105	0.00	47.67	-9.96	231.56
110	0.00	44.69	-9.26	234.65
115	0.00	42.02	-8.59	237.66
120	0.00	39.71	-7.97	240.47
125	0.00	37.83	-7.45	242.91
130	0.00	36.45	-7.04	244.92
135	0.00	35.64	-6.80	246.09
140	0.00	35.42	-6.73	246.40
145	0.00	35.81	-6.85	245.83
150	0.00	36.80	-7.15	244.44
155	0.00	38.33	-7.59	242.25
160	0.00	40.26	-8.12	239.78
165	0.00	42.43	-8.69	237.19
170	0.00	44.96	-9.32	234.36
175	0.00	47.81	-9.99	231.42
180	0.00	50.91	-10.00	231.37
185	0.00	54.22	-10.00	231.37

#### Earth Station Data Sheet

Coordination Values	HAGERSTOWN, MD
Licensee Name	Intelsat License LLC
Latitude (NAD 83)	39° 35' 53.1" N
Longitude (NAD 83)	77° 45' 22.3" W
Ground Elevation (AMSL)	170.08 m / 558.0 ft
Antenna Centerline (AGL)	8.66 m / 28.4 ft
Antenna Model	Vertex/RSI 13.1 Meter
Antenna Mode	Receive 11.0 GHz
Interference Objectives: Long Ter	m -156.0 dBW/MHz 20%
Short Te	rm -146.0 dBW/MHz 0.01%

Horizon Antenna Horizon Coordination	
Azimuth (°) Elevation (°) Discrimination (°) Gain (dBi) Distance (km)	
190 0.00 57.70 -10.00 231.37	
195 0.00 61.32 -10.00 231.37	
200 0.00 65.04 -10.00 231.37	
205 0.00 68.86 -10.00 231.37	
210 0.00 72.74 -10.00 231.37	
215 0.00 76.68 -10.00 231.37	
220 0.00 80.65 -10.00 231.37	
225 0.00 84.65 -10.00 231.37	
230 0.00 88.67 -10.00 231.37	
235 0.00 92.69 -10.00 231.37	
240 0.00 96.70 -10.00 231.37	
245 0.00 100.69 -10.00 231.37	
250 0.00 104.65 -10.00 231.37	
255 0.00 108.57 -10.00 231.37	
260 0.00 112.44 -10.00 231.37	
265 0.00 116.22 -10.00 231.37	
270 0.00 119.92 -10.00 231.37	
275 0.00 123.49 -10.00 231.37	
280 0.00 126.92 -10.00 231.37	
285 0.00 130.16 -10.00 231.37	
290 0.00 133.18 -10.00 231.37	
295 0.00 135.93 -10.00 231.37	
300 0.00 138.35 -10.00 231.37	
305 0.00 140.37 -10.00 231.37	
310 0.00 141.94 -10.00 231.37	
315 0.00 142.99 -10.00 231.37	
320 0.00 143.48 -10.00 231.37	
325 0.00 143.38 -10.00 231.37	
330 0.00 142.70 -10.00 231.37	
335 0.00 141.47 -10.00 231.37	
340 0.00 139.66 -10.00 231.37	
345 0.00 137.24 -10.00 231.37	
350 0.00 134.47 -10.00 231.37	
355 0.24 131.57 -10.00 227.58	

## **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.

BΥ·

Gary K. Edwards Senior Manager COMSEARCH 19700 Janelia Farm Boulevard Ashburn, VA 20147

DATED: October 27, 2015

Exhibit J

# FREQUENCY COORDINATION AND INTERFERENCE ANALYSIS REPORT

Prepared for Intelsat License LLC HAGERSTOWN, MD (E140121) Satellite Earth Station

Prepared By: COMSEARCH 19700 Janelia Farm Boulevard Ashburn, VA 20147 October 27, 2015

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Link Information Satellite Type Mode Modulation Satellite Arc Azimuth Range Corresponding Elevation Angles Antenna Centerline (AGL)	Geostationary RO - Receive-Only Digital 49° W to 51° West Longitude 139.3° to 141.7° 35.4° / 36.5° 8.66 m / 28.4 ft
Antenna Information Manufacturer Model Gain / Diameter 3-dB / 15-dB Beamwidth Interference Objectives: Long Terr	
Short Terr <b>Frequency Information</b> Emission / Frequency Range (MHz)	
Max Great Circle Coordination Distance Precipitation Scatter Contour Radius	246.4 km / 153.1 mi 478.1 km / 297.0 mi

#### Earth Station Data Sheet

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Antenna Mode	Receive 11.0 GHz	
Interference Objectives: Long Terr	m -156.0 dBW/MHz 20%	
Short Ter	m -146.0 dBW/MHz 0.01%	6

			Receive	e 11.0 GHz
	Horizon	Antenna	Horizon	Coordination
Azimuth (°)	Elevation (°)	Discrimination (°)	Gain (dBi)	Distance (km)
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70	0.00	73.24	-10.00	231.37
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80	0.00	65.39	-10.00	231.37
85	0.00	61.59	-10.00	231.37
90	0.00	57.88	-10.00	231.37
95	0.00	54.30	-10.00	231.37
100	0.00	50.88	-10.00	231.37
105	0.00	47.67	-9.96	231.56
110	0.00	44.69	-9.26	234.65
115	0.00	42.02	-8.59	237.66
120	0.00	39.71	-7.97	240.47
125	0.00	37.83	-7.45	242.91
130	0.00	36.45	-7.04	244.92
135	0.00	35.64	-6.80	246.09
140	0.00	35.42	-6.73	246.40
145	0.00	35.81	-6.85	245.83
150	0.00	36.80	-7.15	244.44
155	0.00	38.33	-7.59	242.25
160	0.00	40.26	-8.12	239.78
165	0.00	42.43	-8.69	237.19
170	0.00	44.96	-9.32	234.36
175	0.00	47.81	-9.99	231.42
180	0.00	50.91	-10.00	231.37
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Antenna Model	ViaSat 13.5 meter
Antenna Mode	Receive 11.0 GHz
Interference Objectives: Long Terr	m -156.0 dBW/MHz 20%
Short Terr	m -146.0 dBW/MHz 0.01%

			Receive	e 11.0 GHz	
	Horizon	Antenna	Horizon	Coordination	
Azimuth (°)	Elevation (°)	Discrimination (°)	Gain (dBi)	Distance (km)	
190	0.00	57.70	-10.00	231.37	
195	0.00	61.32	-10.00	231.37	
200	0.00	65.04	-10.00	231.37	
205	0.00	68.86	-10.00	231.37	
210	0.00	72.74	-10.00	231.37	
215	0.00	76.68	-10.00	231.37	
220	0.00	80.65	-10.00	231.37	
225	0.00	84.65	-10.00	231.37	
230	0.00	88.67	-10.00	231.37	
235	0.00	92.69	-10.00	231.37	
240	0.00	96.70	-10.00	231.37	
245	0.00	100.69	-10.00	231.37	
250	0.00	104.65	-10.00	231.37	
255	0.00	108.57	-10.00	231.37	
260	0.00	112.44	-10.00	231.37	
265	0.00	116.22	-10.00	231.37	
270	0.00	119.92	-10.00	231.37	
275	0.00	123.49	-10.00	231.37	
280	0.00	126.92	-10.00	231.37	
285	0.00	130.16	-10.00	231.37	
290	0.00	133.18	-10.00	231.37	
295	0.00	135.93	-10.00	231.37	
300	0.00	138.35	-10.00	231.37	
305	0.00	140.37	-10.00	231.37	
310	0.00	141.94	-10.00	231.37	
315	0.00	142.99	-10.00	231.37	
320	0.00	143.48	-10.00	231.37	
325	0.00	143.38	-10.00	231.37	
330	0.00	142.70	-10.00	231.37	
335	0.00	141.47	-10.00	231.37	
340	0.00	139.66	-10.00	231.37	
345	0.00	137.24	-10.00	231.37	
350	0.00	134.47	-10.00	231.37	
355	0.24	131.57	-10.00	227.58	

# **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.

LE.E BΥ·

Gary K. Edwards Senior Manager COMSEARCH 19700 Janelia Farm Boulevard Ashburn, VA 20147

DATED: October 27, 2015