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July 11, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: United Teleports Inc. – Section 1.65 Submission,
File No. SES-LIC-20160513-00427 (Call Sign E160081)**

Dear Ms. Dortch:

United Teleports Inc. (“United Teleports”), pursuant to Section 1.65 of the Commission’s Rules, 47 C.F.R. § 1.65, hereby updates the record of the above-referenced fixed earth station license application to provide certain supplemental information regarding the orbital debris mitigation plan for the Eutelsat 65 West A (“E65WA”) spacecraft.

The application seeks authority to add the E65WA satellite as an authorized point of communication for the subject 7m gateway earth station in Concord, California. In support of its application, United Teleports provided an orbital debris mitigation plan for the spacecraft.¹ Subsequent to submitting the application, United Teleports has had further discussions with the Commission and the satellite operator, and provides the following information regarding the residual helium pressurant that is expected to be on board the satellite at end of life.

The E65WA satellite is based on the Space Systems/Loral 1300 model spacecraft. United Teleports has been advised that although the helium will be vented as part of the retirement procedures for the satellite, a regulator on the tanks will prevent complete expulsion of the helium. United Teleports has confirmed that the E65WA propulsion subsystem design, in particular the regulator and downstream check valve characteristics, will ensure that the minimum pressure in the three interconnected helium tanks (65 liters each) will be no higher than 1.6psia (0.11 bar). The specification for the minimum inlet pressure below which that regulator cuts off the flow of helium is 400 psia. Based on that pressure, and assuming a temperature of 298K, the residual helium after depletion is estimated to be approximately 3.5 grams. The tank pressure of 1.6 psia will be a fraction of the tanks’ maximum expected operating pressure, which is 4000 psia.

United Teleports seeks a waiver of Section 25.283(c) of the Commission’s Rules with respect to the residual helium that will remain on the E65WA satellite at end of life to the extent necessary to grant this application. That section requires that space station operators take steps as part of the retirement procedures to discharge energy sources on board the satellite, including “relieving pressure vessels.” 47 C.F.R. § 25.283(c). As discussed above, although the helium will be substantially depleted as part of the

¹ See United Teleports Inc., File No. SES-LIC-20160513-00427 (Call Sign E160081) Technical Appendix, § 8.



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retirement process and virtually undetectable, thus “relieving” the pressure in these tanks, once the inlet pressure drops below the set point of the regulator it is impossible to continue to expel the helium. This limitation is part of the design of the spacecraft. In addition, E65WA is already in orbit. Under these circumstances, grant of a waiver would be consistent with Commission precedent.²

United Teleports requests that the Commission take this supplemental orbital debris information into account and grant this earth station application at the earliest practicable time.

Please do not hesitate to contact me with any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Carlos M. Nalda".

Carlos M. Nalda
Principal
LMI Advisors

cc: Merissa Velez

² See, e.g., Gogo LLC Section 1.65 Letter, File No. SES-MFS-20151022-00735 (Call Sign E120106).