

KA260

SES-STA-20100715-00909

IB2010002222

Intelsat North America LLC

Approved by OMB
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
STA for LEOP Services for RASCOM-QAF 1R Satellite Using Earth Station KA260

1. Applicant

Name:	Intelsat North America LLC	Phone Number:	202-944-7848
DBA Name:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H Crandall		

With Condition



File # SES-STA-20100715-00909

Call Sign KA260 Grant Date 7/23/2010
(or other identifier)

Term Dates
From Launch To: + 30 days

Approved: Paul E. Black
Chief, Systems Analysis Branch

Attachment

SES-STA-20100715-00909
KA260

Condition:

All operations shall be on an unprotected and non-harmful interference basis, i.e., Intelsat North America LLC. shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference.

With Condition:



File # SES-STA-20100715-00909

Call Sign KA260 Grant Date 7/23/2010
(or other identifier)

Term Dates

From Kauna To: +30 days

Approved:

Mark E. May

Chief, Systems Analysis Branch

2. Contact

Name:	Intelsat North America LLC	Phone Number:	202-944-7848
Company:		Fax Number:	202-944-7870
Street:	c/o Intelsat Corporation 3400 International Drive, N.W.	E-Mail:	susan.crandall@intelsat.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20008 -3006
Attention:	Susan H. Crandall	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 CGX – Fixed Satellite Transmit/Receive Earth Station

5. Type Request

Use Prior to Grant

Change Station Location

Other

6. Requested Use Prior Date

7. City Clarksburg

8. Latitude
(dd mm ss.s h) 39 13 5.0 N

9. State MD	10. Longitude (dd mm ss.s h) 77 16 12.0 W
11. Please supply any need attachments. Attachment 1: STA Request Attachment 2: Exhibit A Attachment 3: Exhibit B	
12. 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.) <div style="border: 1px solid black; padding: 5px; margin: 10px 0;">Intelsat North America LLC herein requests a grant of Special Temporary Authority for 30 days, from August 3, 2010 through September 1, 2010, to use its Clarksburg, Maryland C-band earth station -- call sign KA260 -- to provide launch and early orbit phase services for the RASCOM-QAF 1R satellite that is expected to be launched on August 3, 2010.</div>	
13. 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. <input checked="" type="radio"/> Yes <input type="radio"/> No	
14. Name of Person Signing Susan H. Crandall	15. Title of Person Signing Asst. General Counsel, Intelsat Corporation
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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Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

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, 2010

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



Re: Request for Special Temporary Authority
Clarksburg, Maryland Earth Station KA260

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from August 3, 2010 through September 1, 2010, to use its Clarksburg, Maryland C-band earth station -- call sign KA260 -- to provide launch and early orbit phase ("LEOP") services for the RASCOM-QAF 1R satellite that is expected to be launched on August 3, 2010.² The LEOP period is expected to last approximately 10 days.³

The RASCOM-QAF 1R LEOP operations will be performed in the following frequency bands: 6182 MHz and 6183.5 MHz (uplink) and 3956.2 MHz and 3957.7 MHz (downlink). The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁴ All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

The 24x7 contact information for the RASCOM-QAF 1R LEOP mission is as follows:

Harry Burnham or Mike Munion
Ph.: (202) 944-7753 (primary)
(202) 944-7701 (back-up)

In further support of this request, Intelsat is attaching Exhibit A, which contains a waiver request, as well as Exhibit B, which contains technical

¹ Intelsat has filed its STA request, an FCC Form 159, a \$175.00 filing fee and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

² The permanent orbital location for RASCOM-QAF 1R is 2.8° E.L.

³ Intelsat is seeking authority through September 1, 2010 to accommodate a possible launch delay.

⁴ Telespazio, which was hired by the manufacturer of RASCOM-QAF 1R, is coordinating the LEOP mission.

Ms. Marlene H. Dortch
July 15, 2010
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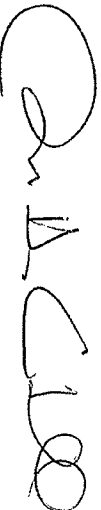
information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

Intelsat also notes that for purposes of the RASCOM-QAF IR LEOP mission, it is seeking to operate in the frequencies listed in the request at power levels not to exceed 26.5 dBW. The technical information submitted with the STA request reflects a higher power level of 30.5 dBW because that is the level at which Intelsat might operate in the event an emergency necessitates the use of a higher power level in order to command the satellite.

Grant of this STA request will allow Intelsat to help launch the RASCOM-QAF IR satellite to the 2.8° E.L. location. This, in turn, will promote the public interest by ensuring continuity of service from that location to Africa, Europe and the Middle East.

Please direct any questions regarding this STA request to the undersigned at (202) 944-7848.

Respectfully submitted,



Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

Cc: Kathryn Medley

Exhibit A

2
PETITION FOR WAIVER OF SECTIONS 25.137 AND 25.114

Pursuant to Section 25.137 of the Federal Communications Commission's ("Commission" or "FCC") rules, earth station applicants "requesting authority to operate with a non-U.S. licensed space station *to serve the United States*" must demonstrate that effective competitive opportunities exist and must provide the same technical information required by Section 25.114 for U.S.-licensed space stations.¹ Intelsat herein seeks authority to provide launch and early orbit phase ("LEOP") services -- not commercial services -- to the United States, and thus believes that Section 25.137 does not apply.

To the extent the Commission determines, however, that Intelsat's request for authority to provide LEOP services on a special temporary basis is a request to serve the United States with a non U.S.-licensed satellite, Intelsat respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission's rules.² The Commission may grant a waiver for good cause shown.³ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁴ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁵ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause exists for a waiver of both Section 25.137 and Section 25.114. With respect to Section 25.114, Intelsat seeks authority only to provide LEOP services for the RASCOM-QAF 1R satellite. Intelsat has already provided with its STA request all the technical information relating to the LEOP services that Intelsat will be performing. The information sought by Section 25.114 is not relevant to LEOP services. Moreover, Intelsat does not have -- and would not easily be able to obtain -- such information because Intelsat is not the operator of the RASCOM-QAF 1R satellite, nor is Intelsat in contractual privity with that operator. Rather, Intelsat has a contract with Telespazio, which was hired by Thales, the manufacturer of the RASCOM-QAF 1R satellite, to conduct LEOP services for the satellite.

The information that Intelsat is not including is not required to determine potential harmful interference. The Schedule S information for this satellite would pertain to the operation of the RASCOM-QAF 1R satellite at its final orbital location. However, the present application for LEOP services involves communications *prior* to the satellite attaining its final location in the geostationary orbit. In other words, during the LEOP mission, the earth station will not be

¹ 47 C.F.R. § 25.137 (emphasis added).

² 47 C.F.R. §§ 25.137 and 25.114.

³ 47 C.F.R. § 1.3.

⁴ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

⁵ *WALT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

communicating with a satellite located in the geostationary orbit. Rather, it will be transmitting to a satellite traveling on its “transfer orbit” or “LEOP path”, which starts immediately following its separation from a launch vehicle, and ends when the satellite reaches its geostationary orbital location. Moreover, as with any STA, Intelsat will perform the LEOP services on a non-interference basis.

Because it is not relevant to the service for which Intelsat seeks authorization, and because obtaining the information would be a hardship, Intelsat seeks a waiver of all the information required by Section 25.114. As noted above, Intelsat has provided the required technical information that is relevant to the LEOP services for which Intelsat seeks authorization.

Good cause also exists to waive Section 25.137. Section 25.137 is designed to ensure that “U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services” in other countries.⁶ Here, there is no service being provided by the satellite; it is simply being placed in its orbital location after separating from the launch vehicle. Thus, the purpose of the information required by Section 25.137 is not implicated here. For example, Section 25.137(d) requires earth station applicants requesting authority to operate with a non-U.S.-licensed space station that is not in orbit and operating to post a bond.⁷ The underlying purpose in having to post a bond—*i.e.*, to prevent warehousing of orbital locations by operators seeking to serve the United States—would not be served by requiring Intelsat to post a bond in order to provide approximately 10 days of LEOP services to the RASCOM-QAF 1R satellite.

It is Intelsat’s understanding that RASCOM-QAF 1R will operate against ITU filings held by RASCOM, an intergovernmental organization, and will be operated by RASCOMStar, a Mauritius company.⁸ It is also Intelsat’s understanding that at 2.8° E.L., RASCOM-QAF 1R will not serve the United States. Thus, the purposes of Section 25.137—to ensure that U.S. satellite operators enjoy “effective competitive opportunities” to serve foreign markets and to prevent warehousing of orbital locations serving the United States—will not be undermined by grant of this waiver request.

Finally, Intelsat notes that it expects to operate with the RASCOM-QAF 1R satellite using its U.S. earth station for a period of approximately 10 days. Requiring Intelsat to obtain copious technical and legal information from an unrelated party, where there is no risk of harmful interference and the operations will cease after approximately 10 days, would pose undue hardship without serving underlying policy objectives. Given these particular facts, the waiver sought herein is plainly appropriate.

⁶ 47 C.F.R. § 25.137(a).

⁷ See 47 C.F.R. § 25.137(d)(4).

⁸ Mauritius is a WTO-member country.

Prepared By

COMSEARCH

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Prepared For

**Intelsat North America LLC
CLARKSBURG, MARYLAND**

Temporary Transmit/Receive Earth Station
Operation Dates: 08/01/2010 – 02/01/2011

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. Verbal and written coordination was conducted with the below listed carriers on June 28, 2010.

Company

ALLTEL Communications, LLC
AMERICAN ELECTRIC POWER SERVICE CORP.
APPALACHIAN POWER COMPANY
AT&T COMM. OF THE SOUTH CENTRAL STATES
AT&T COMMUNICATIONS OF MARYLAND INC
AT&T COMMUNICATIONS OF VIRGINIA INC
AT&T COMMUNICATIONS OF WEST VIRGINIA
AT&T CORP
Allegheny Power Service Corporation
Altel Communications of Virginia #1 LLC
Atlantic Broadband (Delmar), LLC
Atlantic Broadband (Penn), LLC
BAY BROADBAND COMMUNICATIONS LLC
Baltimore County of Maryland
Baltimore Gas and Electric Company
COLLEGE OF SOUTHERN MARYLAND
Celloco Partnership - Southern Virginia
Celloco Partnership - PA Region
Celloco Partnership-Newark-Dallas Verizon
Celloco Partnership-Washington/Baltimore
Charles, County of
Conterra Ultra Broadband, LLC
County of Frederick
County of Stafford
County of York
DELAWARE STATE - DTI
Enoch Pratt Free Library
Exelon Generation Company, L.L.C
Federal Communications Commission
Frederick County
HANOVER COUNTY
HENRICO COUNTY

Company (Continued)

Hardy Cellular Telephone Company
International Communications Group, Inc.
KENTUCKY POWER COMPANY
LB Tower Company LLC
Local Communications Network, Inc.
Loudoun, County of
MARYLAND PUBLIC BROADCASTING COMMISSION
MCI Communications Services Inc.
METROPOLITAN AREA NETWORKS, INC.
Maryland State Highway Administration
Maryland, State of - Budget & Management
National Radio Astronomy Observatory
New Cingular Wireless PCS - VA/DC/MD
New Cingular Wireless PCS LLC - DC
New Cingular Wireless PCS LLC - Ohio
New Cingular Wireless PCS, LLC - PA
New Cingular Wireless PCS, LLC - WV/WVA
Norfolk Southern Railway
Northern Virginia Electric Cooperative
PENNSYLVANIA TURNPIKE COMMISSION
PRINCE WILLIAM COUNTY
Prince George's County
RAPPAHANNOCK ELECTRIC COOPERATIVE
RCTC Wholesale Corporation - Verizon
SCTF NET
Southern Maryland Electric Cooperative I
State of Maryland, MIEMSS
State of WV DHHR/BPH STECS
Texas Eastern Communications, Inc.
USCOOC of Cumberland, Inc.
Verizon Maryland, Inc.
Virginia Broadband, LLC
Virginia Department of State Police
Virginia Electric & Power Company
Virginia PCS Alliance, L.C.
WASHINGTON SUBURBAN SANITARY COMMISSION
WEST VIRGINIA EDUCATIONAL BROADCASTING
WEST VIRGINIA MEDIA HOLDINGS, LLC
Washington D.C. SMSA L.P.
Washington Gas Light Company
Wireless Strategies, Inc.

There are no unresolved interference objections with the stations contained in these applications.

The following section presents the data pertinent to frequency coordination of the proposed earth station that was circulated to all carriers within its coordination contours.

COMSEARCH
Earth Station Data Sheet
 19700 Janelia Farm Boulevard, Ashburn, VA 20147
 (703)726-5500 <http://www.comsearch.com>

Date: 06/28/2010
 Job Number: 100628COMSJC01

Administrative Information

Status: TEMPORARY (Operation from 08/01/2010 to 02/01/2011)
 Call Sign: TEMP02
 Licensee Code: INTNOA
 Licensee Name: Intelsat North America LLC

Site Information

Venue Name: **CLARKSBURG, MARYLAND**
 Latitude (NAD 83): 39° 13' 5.4" N
 Longitude (NAD 83): 77° 16' 10.9" W
 Climate Zone: A
 Rain Zone: 2
 Ground Elevation (AMSL): 140.82 m / 462.0 ft

Link Information

Satellite Type: Geostationary
 Mode: TR - Transmit-Receive
 Modulation: Digital
 Satellite Arc: 5° W to 149° West Longitude
 Azimuth Range: 101.4° to 258.2°
 Corresponding Elevation Angles: 5.0° / 5.4°
 Antenna Centerline (AGL): 5.18 m / 17.0 ft

Antenna Information

Manufacturer	Receive - V40901	Transmit - V60901
Model	VERTEX COMMUNICATIONS	VERTEX COMMUNICATIONS
Gain / Diameter	9 KPC	9 KPC
3-dB / 15-dB Beamwidth	50.1 dBi / 9.0 m	53.5 dBi / 9.0 m
	0.55° / 1.20°	0.40° / 0.80°

Max Available RF Power	(dBW/4 KHz)	7.2
	(dBW/MHz)	30.5
Maximum EIRP	(dBW/4 KHz)	60.7
	(dBW/MHz)	84.0
	(dBW)	84.0

Interference Objectives:	Long Term	-156.0 dBW/MHz	20%	-154.0 dBW/4 KHz	20%
	Short Term	-146.0 dBW/MHz	0.01%	-131.0 dBW/4 KHz	0.0025%

Frequency Information

Emission / Frequency Range (MHz)	Receive 4.0 GHz	Transmit 6.1 GHz
	150KFXD / 3956.2	850KFXD / 6182.0
	150KFXD / 3957.7	850KFXD / 6183.5

Max Great Circle Coordination Distance	678.4 km / 421.5 mi	520.9 km / 323.6 mi
Precipitation Scatter Contour Radius	620.7 km / 385.7 mi	435.6 km / 270.6 mi

COMSEARCH

Earth Station Data Sheet

19700 Janella Farm Boulevard, Ashburn, VA 20147
 (703)726-5500 <http://www.comsearch.com>

Coordination Values

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

CLARKSBURG, MD

Intelsat North America LLC
 39° 13' 5.4" N
 77° 16' 10.9" W
 140.82 m / 462.0 ft
 5.18 m / 17.0 ft

VERTEX COMMUNICATIONS 9 KPC

Antenna Model

Receive 4.0 GHz

Transmit 6.1 GHz

Interference Objectives: Long Term

-156.0 dBW/MHz 20%

-154.0 dBW/4 KHz

Short Term

-146.0 dBW/MHz 0.01%

-131.0 dBW/4 KHz

20%
 0.0025%

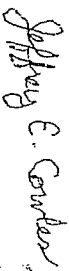
Max Available RF Power

7.2 (dBW/4 KHz)

Azimuth (°)	Horizon		Antenna Discrimination (°)	Receive 4.0 GHz		Transmit 6.1 GHz	
	Elevation (°)	Antenna		Horizon	Coordination	Horizon	Coordination
			Gain (dBi)	Distance (km)	Gain (dBi)	Distance (km)	
190	0.22	43.36	-11.57	273.10	-15.19	186.89	
195	0.00	42.32	-11.36	276.75	-14.36	192.07	
200	0.37	40.31	-10.96	258.91	-12.75	181.29	
205	0.45	38.18	-9.81	256.65	-11.77	177.33	
210	0.83	35.47	-8.18	239.63	-10.69	156.16	
215	1.22	32.50	-6.90	229.72	-10.00	143.80	
220	1.68	29.24	-5.90	220.44	-9.04	135.09	
225	2.21	25.75	-5.90	206.74	-6.95	132.55	
230	2.05	22.60	-5.90	210.23	-5.54	139.95	
235	1.99	19.24	-5.90	211.70	-4.50	145.49	
240	2.59	15.30	-5.90	200.91	-4.56	134.16	
245	2.59	11.69	-3.59	209.79	-4.70	133.72	
250	2.59	8.01	-0.91	224.35	-3.51	136.89	
255	2.51	4.32	1.47	374.96	-1.13	260.12	
260	2.51	3.40	2.10	644.31	0.90	492.57	
265	2.67	7.32	-0.22	226.51	-3.50	135.37	
270	2.91	12.05	-3.95	203.57	-4.61	128.03	
275	2.98	16.96	-5.90	192.61	-4.60	126.89	
280	3.31	21.89	-5.90	185.29	-5.25	118.39	
285	3.55	26.85	-5.90	180.05	-7.61	104.99	
290	3.61	31.84	-6.63	174.89	-9.87	100.00	
295	3.61	36.83	-9.00	160.79	-11.23	100.00	
300	3.61	41.82	-11.26	149.87	-13.96	100.00	
305	3.61	46.82	-12.26	145.31	-15.50	100.00	
310	3.56	51.82	-13.26	141.87	-15.50	100.00	
315	3.42	56.82	-14.26	140.28	-15.50	100.00	
320	3.10	61.82	-14.90	143.74	-15.50	100.00	
325	2.71	66.82	-15.90	147.36	-15.50	100.00	
330	2.47	71.82	-15.90	152.58	-15.50	100.00	
335	1.91	76.82	-15.90	166.49	-15.50	107.96	
340	1.55	81.81	-15.90	179.18	-15.50	116.90	
345	1.49	86.80	-15.90	181.00	-15.50	118.42	
350	1.48	91.79	-15.90	181.46	-15.50	118.81	
355	1.42	96.78	-15.90	183.00	-15.50	120.12	

Certification

I hereby certify that I am the technically qualified person responsible for the preparation of the frequency coordination data contained in this report. I am familiar with Parts 101 and 25 of the FCC Rules and Regulations and I have either prepared or reviewed the frequency coordination data submitted with this report, and that it is complete and correct to the best of my knowledge and belief.



Jeffrey E. Cowles
Principal Frequency Planner
COMSEARCH
19700 Janelia Farm Blvd.
Ashburn, Va. 20147

DATED: July 14, 2010