


APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Request for Special Temporary Authority Using Fillmore, California Earth Station E4132

1. Applicant

Name:	Intelsat License 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		

SES-STA-20110802-00915
E4132
Call Sign E4132 Grant Date 8-15-11
(or other identifier)
From 8-17-11 Term Expires 9-15-11
Approved: Paul E. Blas
with conditions



Conditions of Grant of Intelsat SES-STA-20110802-00915

Intelsat License LLC is authorized to operate E4132, at Fillmore, California, to provide launch and early orbit phase ("LEOP") services to the Express-AM4 Fillmore, California for telemetry, tracking, and control communications with the Express AM4 spacecraft (to operate at 80 ° E. L.) beginning August 17, 2011 for a period of 30 days on frequencies 6535.0 MHz Earth-to-Space and 4199.5 MHz space-to-Earth within the parameter defined in application SES-STA-20110802-00915 under the following conditions.

1. All operations shall be on an unprotected and non-harmful interference basis, i.e., Intelsat shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station.
2. In the event that there is a report of interference, Intelsat must immediately terminate transmissions and notify the FCC in writing.

SES-STA-20110802-00915

	Call Sign <u>E4132</u>	Grant Date <u>8-15-11</u>
	(or other identifier)	
GRANTED	From <u>8-17-11</u>	Term Date <u>9-15-11</u>
International Bureau	Approved <u>[Signature]</u>	

2. Contact

Name:	Susan H Crandall	Phone Number:	202-944-7848
Company:	Intelsat Corporation	Fax Number:	202-944-7870
Street:	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 Fillmore

8. Latitude
(dd mm ss.s h) 34 24 22.0 N

9. State CA	10. Longitude (dd mm ss.s h) 118 53 34.0 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 License LLC herein requests a grant of Special Temporary Authority for 30 days, from August 17, 2011 through September 15, 2011, to use its Fillmore, California C-band earth station, call sign E4132, to provide launch and early orbit phase services to the Express-AM4 satellite that is expected to be launched on August 17, 2011.</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

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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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.

Exhibit A

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 License LLC ("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 Express-AM4 satellite. 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 Express-AM4 satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with Telespazio, which is a subcontractor for the Express-AM4 LEOP mission, 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 Express-AM4 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 communicating with a satellite located in the geostationary orbit. Rather, it will be transmitting

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

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. Intelsat has provided in this STA request 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. 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.⁶ 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 ten days of LEOP services to the Express-AM4 satellite.

It is Intelsat’s understanding that Express-AM4 is licensed by Russia, which is a WTO-observer country. It is also Intelsat’s understanding that at its permanent orbital location of 80.0° E.L., Express-AM4 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 Express-AM4 satellite using its U.S. earth station for a period of approximately ten 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 ten days, would pose undue hardship without serving underlying policy objectives. Given these particular facts, the waiver sought herein is plainly appropriate.

⁶ See 47 C.F.R. §25.137(d)(4).

Prepared By

COMSEARCH

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

Prepared For

**Intelsat License LLC
FILLMORE, CALIFORNIA**

Temporary Transmit-Only Earth Station
Operation Dates: 08/15/2011 - 11/15/2011

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 July 21, 2011.

Company

AERA ENERGY LLC
AT&T California
BNSF Railway Company
Boeing Company
CARITAS TELECOMMUNICATIONS
CBS Broadcasting Inc
CBS Communications Services
CITY OF POMONA COMMUNICATIONS
California, State of
Calico Partnership - California
Chevron USA Inc.
Coachella Valley Water District
El Paso Natural Gas Company
Exxon Communications Company
FALCON CABLEVISION, A CALIFORNIA L.P.
Federal Communications Commission
Fresno, MSA Limited Partnership
Fresno, County of
GTE Mobilnet of California LTD Partnersh
GTE Mobilnet of Santa Barbara LTD Ptnsh
GULF-CALIFORNIA BROADCAST COMPANY
Glendale, City of
HARRIS CORPORATION
INCOMM DIVISION CHURCH OF SCIENTOLOGY
Imperial Irrigation District
KERN ED TELECOM CONSORTIUM
Kern, County of
LOS ANGELES CITY WATER & POWER
LOS ANGELES UNIFIED SCHOOL DISTRICT

Company (Continued)

Los Angeles City Info Technology Agency
Los Angeles County Dept of Public Works
Los Angeles County FCC Licensing Section
Los Angeles County Metro Transit Auth
Los Angeles SMTA Ltd. Partnership
MOBILE RELAY ASSOCIATES INC
Metropolitan Water Dist of So California
Mile High Inc
NEXTEL OF CALIFORNIA INC
New Cingular Wireless PCS - Los Angeles
New Cingular Wireless PCS -PNW Region
New Cingular Wireless PCS LLC - N CAL
New Cingular Wireless PCS LLC -San Diego
ORANGE, COUNTY OF, CA
PACIFIC PIPELINE SYSTEM LLC
Pacific Gas and Electric Company
Palomar Observatory California Institute
Paramount Farming Company, LLC.
Plains Exploration & Production Company
Riverside, County of
SAN DIEGO COUNTY
SAN DIEGO, CITY OF
SAN LUIS OBISPO COUNTY
San Bernardino County of California
San Diego Gas & Electric Company
Santa Barbara Cellular Systems, Ltd.
Santa Barbara, County of
Southern California Edison Company
Southern California Gas Company
Sprint Telephony PCS, L.P.
T-Mobile License LLC
TULARE, COUNTY OF
TV MICROWAVES CO
Union Pacific Railroad Company
University of California,HPWREN
VENOCO, INC.
Ventura, County of
Verizon California Inc.
Verizon Wireless (VAV) LLC (CA)
WWC License L.L.C.
WWC License L.L.C. - California

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

Date: 08/01/2011
Job Number: 110721COMSJC05

Administrative Information

Status: TEMPORARY (Operation from 08/15/2011 to 11/15/2011)
Call Sign: TEMP11
Licensee Code: INTELS
Licensee Name: Intelsat License LLC

Site Information

FILLMORE, CA

Venue Name
Latitude (NAD 83) 34° 24' 22.0" N
Longitude (NAD 83) 118° 53' 37.4" W
Climate Zone A
Rain Zone 4
Ground Elevation (AMSL) 313.94 m / 1030.0 ft

Link Information

Satellite Type Low Earth Orbit
Mode TO - Transmit-Only
Modulation Analog and Digital
Minimum Elevation Angle 5.0°
Azimuth Range 0.0° to 360°
Antenna Centerline (AGL) 8.23 m / 27.0 ft

Antenna Information

Transmit - FCC32

Manufacturer Scientific-Atlanta
Model 10.3 Meter
Gain / Diameter 53.8 dBi / 10.3 m
3-dB / 15-dB Beamwidth 0.40° / 0.60°

Max Available RF Power (dBW/4 KHz) 10.9
(dBW/MHz) 34.2
Maximum EIRP (dBW/4 KHz) 64.7
(dBW/MHz) 88.0
(dBW) 88.0

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

Frequency Information

Transmit 6.7 GHz

Emission / Frequency Range (MHz) 850KFXD / 6535.0

Max Great Circle Coordination Distance 347.9 km / 216.2 mi
Precipitation Scatter Contour Radius 325.4 km / 202.2 mi

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

Coordination Values	FILLMORE, CA
Licensee Name	Intelsat License LLC
Latitude (NAD 83)	34° 24' 22.0" N
Longitude (NAD 83)	118° 53' 37.4" W
Ground Elevation (AMSL)	313.94 m / 1030.0 ft
Antenna Centerline (AGL)	8.23 m / 27.0 ft
Antenna Model	Scientific-Atlanta 10.3 Meter
Antenna Mode	Transmit 6.7 GHz
Interference Objectives: Long Term	-154.0 dBW/4 KHz 20%
Short Term	-131.0 dBW/4 KHz 0.0025%
Max Available RF Power	10.9 (dBW/4 KHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.7 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	9.46	76.90	-10.00	256.40
5	9.82	73.29	-10.00	256.40
10	11.85	70.32	-10.00	256.40
15	10.92	66.54	-10.00	256.40
20	12.90	64.07	-10.00	256.40
25	13.86	61.47	-10.00	256.40
30	11.04	56.88	-10.00	256.40
35	11.06	53.98	-10.00	256.40
40	11.15	51.35	-10.00	256.40
45	12.08	49.66	-10.00	256.40
50	12.02	47.53	-10.00	256.40
55	12.03	45.81	-10.00	256.40
60	11.89	44.32	-10.00	256.40
65	10.11	41.64	-10.00	256.40
70	10.13	41.15	-10.00	256.40
75	10.10	41.10	-7.96	269.20
80	8.88	40.38	-4.20	292.90
85	8.89	41.39	0.77	324.20
90	6.31	40.55	4.53	347.90
95	6.30	42.57	4.53	347.90
100	6.30	44.99	4.53	347.90
105	6.32	47.74	4.53	347.90
110	5.84	50.44	4.53	347.90
115	3.99	52.69	4.53	347.90
120	2.01	55.33	4.53	347.90
125	1.94	59.11	4.53	347.90
130	2.44	63.20	4.53	347.90
135	2.70	67.25	4.53	347.90
140	2.67	71.27	4.53	347.90
145	2.73	75.36	4.53	347.90
150	2.63	79.46	4.53	347.90
155	3.07	83.64	4.53	347.90
160	2.85	87.77	4.53	347.90
165	3.41	91.91	4.53	347.90
170	3.29	96.04	4.53	347.90
175	3.00	100.19	4.53	347.90
180	2.53	104.38	4.53	347.90

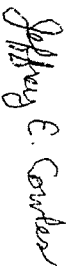
COMSEARCH
Earth Station Data Sheet
 19700 Janelia Farm Boulevard, Ashburn, VA 20147
 (703)726-5500 <http://www.comsearch.com>

Coordination Values	FILLMORE, CA
Licensee Name	Intelsat License LLC
Latitude (NAD 83)	34° 24' 22.0" N
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Ground Elevation (AMSL)	313.94 m / 1030.0 ft
Antenna Centerline (AGL)	8.23 m / 27.0 ft
Antenna Model	Scientific-Atlanta 10.3 Meter
Antenna Mode	Transmit 6.7 GHz
Interference Objectives: Long Term	-154.0 dBW/4 KHz 20%
Short Term	-131.0 dBW/4 KHz 0.0025%
Max Available RF Power	10.9 (dBW/4 KHz)

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Transmit 6.7 GHz Coordination Distance (km)
185	2.35	108.51	4.53	347.90
190	2.29	112.57	4.53	347.90
195	0.78	117.05	4.53	347.90
200	0.26	121.23	4.53	347.90
205	1.27	124.72	4.53	347.90
210	0.97	128.61	4.53	347.90
215	0.87	132.26	4.53	347.90
220	0.00	136.21	4.53	347.90
225	0.00	139.42	4.53	347.90
230	0.00	142.31	4.53	347.90
235	0.00	144.80	4.53	347.90
240	0.00	146.79	4.53	347.90
245	0.00	148.21	4.53	347.90
250	0.00	148.95	4.53	347.90
255	0.00	148.97	4.53	347.90
260	0.00	148.28	4.53	347.90
265	0.00	146.92	4.53	347.90
270	0.00	144.96	4.53	347.90
275	1.12	141.62	0.77	324.20
280	1.30	138.71	-4.20	292.90
285	2.87	134.60	-7.96	269.20
290	4.19	130.57	-10.00	256.40
295	4.03	127.29	-10.00	256.40
300	4.42	123.56	-10.00	256.40
305	3.80	120.15	-10.00	256.40
310	3.10	116.58	-10.00	256.40
315	2.76	112.74	-10.00	256.40
320	3.32	108.58	-10.00	256.40
325	4.76	104.28	-10.00	256.40
330	5.94	100.11	-10.00	256.40
335	7.80	95.98	-10.00	256.40
340	8.26	92.08	-10.00	256.40
345	9.32	88.23	-10.00	256.40
350	9.66	84.45	-10.00	256.40
355	9.64	80.68	-10.00	256.40

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
Engineer III, Telecommunications
COMSEARCH
19700 Janelia Farm Blvd.
Ashburn, Va. 20147

DATED: August 1, 2011

August 2, 2011

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

Re: Request for Special Temporary Authority
Fillmore, California Earth Station E4132



Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from August 17, 2011 through September 15, 2011, to use its Fillmore, California C-band earth station -- call sign E4132 -- to provide launch and early orbit phase ("LEOP") services to the Express-AM4 satellite that is expected to be launched on August 17, 2011.² The LEOP period is expected to last approximately 10 days.³

The Express-AM4 LEOP operations will be performed in the following frequency bands:

6535.0 MHz (uplink) (RHCP for TC1 and LHCP for TC2); and
4199.5 MHz (downlink) (LHCP for TM1 and RHCP for TM2)

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 Express-AM4 LEOP mission is as follows:

¹ Intelsat has filed its STA request, an FCC Form 159, a \$180,00 filing fee and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

² Express-AM4 will be in-orbit tested at the satellite's permanent orbital location of 80.0° E.L.

³ Intelsat is seeking authority through September 15, 2011 to accommodate a possible launch delay.

⁴ Immarsat, which is the LEOP mission manager for Express-AM4, will handle the coordination.

Ms. Marlene H. Dortch
August 2, 2011
Page 2

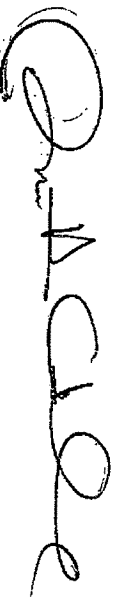
Ph.: (202) 944-7701 – East Coast Operations Center (primary)
(310) 525-5900 – West Coast Operations Center (back-up)
Request to speak with Harry Burnham or Kevin Bell.

In further support to this request, Intelsat is attaching Exhibits A and B, which contain a waiver request, as well as technical 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.

Grant of this STA request will enable Intelsat to help launch the Express-AM4 satellite. This will serve the public interest by providing new capacity at the satellite's permanent location of 80.0° E.L.

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: Paul Blais