EXHIBIT A

INTELSAT LICENSE LLC

SPECIAL TEMPORARY AUTHORITY REQUEST

EARTH STATION KA258

LEOP SERVICES FOR ASTRA-2F SATELLITE

August 24, 2012

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 Astra-2F 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 Astra-2F satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with EADS Astrium, the manufacturer of the Astra-2F 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 Astra-2F 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 to a satellite traveling on its "transfer orbit" or "LEOP

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[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.

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 Astra-2F satellite.

It is Intelsat's understanding that Astra-2F is licensed by Luxembourg, which is a WTO-member country. 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 Astra-2F 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).

EXHIBIT B

INTELSAT LICENSE LLC

SPECIAL TEMPORARY AUTHORITY REQUEST

EARTH STATION KA258

LEOP SERVICES FOR ASTRA-2F SATELLITE

August 24, 2012

Prepared By

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

Prepared For

Intelsat License LLC
Hagerstown, Maryland
Temporary Transmit/Receive Earth Station
Operation Dates: 09/05/2012 – 11/05/2012

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 26, 2012.

Company

ACC License, LLC
ADAMS COUNTY EMERGENCY MANAGEMENT AGENCY
ALLEGANY COUNTY GOVERNMENT
APC Realty and Equipment CO LLC
ARLINGTON COUNTY EMERGENCY COMM CTR
ART Licensing Corp.
AT&T CORP
Airband Communications Inc
B.F. SAUL COMPANY
BUSINESS INFORMATION GROUP, INC.
Believe Wireless, LLC
Blaze Broadband
Boeing Company
CAMP HILL SCHOOL DISTRICT
CBS Broadcasting Inc
CECIL COUNTY PUBLIC SCHOOLS
CNG Transmission Corporation
CRISPUS ATTUCKS ASSOCIATION
Calvert County Government
Cambria, County of
Cape May County Municipal Utilities Auth
Cape May County, MIS Department
Carlisle Area School District
City of Altoona
Clearwire Spectrum Holdings III, LLC
Commissioners of Caroline County
Conterra Ultra Broadband, LLC
Cumberland County, New Jersey
Cumberland Valley School District
DOVER AREA SCHOOL DISTRICT
Delmarva Power & Light Company

Company (Continued)

ECW Wireless, LLC
East Pennsboro Area School
Eastern Lancaster County School District
Eduro Networks LLC
Enoch Pratt Free Library
Federal Communications Commission
Franklin County Dept. of Emergency Servi
GETWIRELESS.NET
George Washington University
Glenville State University
HALIFAX AREA SCHOOL DISTRICT
Harrison County Emergency Services
Hope Gas, Inc.
Kreider Networks
LANCASTER GENERAL HOSPITAL
Last Mile Inc.
Loudoun Wireless LLC
Loudoun, County of
MARYLAND, STATE OF - MDOT - MTA
MLS ENGINEERING
MetroPCS AWS, LLC
NBC TELEMUNDO LICENSE LLC
NEXSTAR BROADCASTING, INC.
National Radio Astronomy Observatory
Netrepid, Inc.
New Cingular Wireless PCS LLC - AZ
New Cingular Wireless PCS LLC - DC
New Cingular Wireless PCS LLC- WV/NC/SC
New Cingular Wireless PCS, LLC - PA
Nextlink Wireless, LLC
Northern York County School District
PENNSYLVANIA MICROWAVE NETWORK INC.
PENNSYLVANIA TURNPIKE COMMISSION
Prince William, County of
RapidDSL & Wireless, Inc.
Red Rose Transit Authority
Red Zebra Broadcasting Licensee, LLC
Roadstar Internet, Inc.
SHIPPENSBURG AREA SCHOOL DISTRICT
SOMERSET COUNTY
SUSQUEHANNA TOWNSHIP SCHOOL DISTRICT
Shenandoah Personal Communications Co
Sprint Spectrum, LP
State of WV DHHR/BPH STECS
Steelton-Highspire School District
Telecom Transport Management, Inc
Turtle Networks 6444
WASHINGTON CABLE SYSTEMS INC
WINEMILLER COMMUNICATIONS, INC.
WKYSFM, INC
Washington Metro Area Transit Police Dep

Company (Continued)

West Virginia PCS Alliance, L.C.
Western PA Internet Access, Inc.
Windstream D&E Systems, Inc.
Wireless Internetwork LLC
World Class Wireless LLC
York County Dept of Emergency Services
York Water Co

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:	08/23/2012
Job Number:	120726COMSJC04

Administrative Information

Status	TEMPORARY (Operation from 09/05/2012 to 11/05/2012)
Call Sign	TEMP11
Licensee Code	INTELS
Licensee Name	Intelsat License LLC

Site Information — HAGERSTOWN, MARYLAND

Venue Name	
Latitude (NAD 83)	39° 35' 54.0" N
Longitude (NAD 83)	77° 45' 33.0" W
Climate Zone	A
Rain Zone	2
Ground Elevation (AMSL)	174.65 m / 573.0 ft

Link Information

Satellite Type	Geostationary
Mode	TO - Transmit-Only
Modulation	Digital
Satellite Arc	6° W to 149° West Longitude
Azimuth Range	101.9° to 257.8°
Corresponding Elevation Angles	5.3° / 5.7°
Antenna Centerline (AGL)	9.45 m / 31.0 ft

Antenna Information — Transmit

Manufacturer		TIW
Model		14.2 Meter
Gain / Diameter		65.1 dBi / 14.2 m
3-dB / 15-dB Beamwidth		0.10° / 0.20°
Max Available RF Power	(dBW/4 kHz)	-0.4
	(dBW/MHz)	23.6
Maximum EIRP	(dBW/4 kHz)	64.7
	(dBW/MHz)	88.7
Interference Objectives:	Long Term	-154.0 dBW/4 kHz 20%
	Short Term	-131.0 dBW/4 kHz 0.0025%

Frequency Information — Transmit 18.0 GHz

Emission / Frequency Range (MHz)	832KFXD / 17311.0
Max Great Circle Coordination Distance	444.4 km / 276.1 mi
Precipitation Scatter Contour Radius	186.6 km / 116.0 mi

COMSEARCH

Earth Station Data Sheet

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

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Longitude (NAD 83)	77° 45' 33.0" W	
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Antenna Centerline (AGL)	9.45 m / 31.0 ft	
Antenna Model	TIW 14.2 Meter	
Antenna Mode	Transmit 18.0 GHz	
Interference Objectives: Long Term	-154.0 dBW/4 kHz	20%
Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	-0.4 (dBW/4 kHz)	

Transmit 18.0 GHz

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	101.81	-10.00	152.75
5	0.00	96.84	-10.00	152.75
10	0.00	91.86	-10.00	152.75
15	0.00	86.88	-10.00	152.75
20	0.00	81.90	-10.00	152.75
25	0.00	76.92	-10.00	152.75
30	0.00	71.95	-10.00	152.75
35	0.00	66.97	-10.00	152.75
40	0.00	62.00	-10.00	152.75
45	0.00	57.03	-10.00	152.75
50	0.00	52.06	-10.00	152.75
55	0.00	47.09	-9.82	153.31
60	0.00	42.14	-8.62	157.23
65	0.00	37.19	-7.26	162.24
70	0.00	32.26	-5.72	167.47
75	0.00	27.34	-3.92	173.65
80	0.00	22.47	-1.79	181.18
85	0.00	17.65	0.83	190.66
90	0.00	12.98	4.17	202.98
95	0.00	8.66	8.56	220.51
100	0.00	5.61	13.27	444.41
105	0.00	6.15	12.28	302.62
110	0.00	9.60	7.45	215.96
115	0.00	13.27	3.93	202.04
120	0.00	16.89	1.31	192.42
125	0.00	20.41	-0.75	184.91
130	0.00	23.83	-2.43	178.90
135	0.00	27.11	-3.83	173.98
140	0.00	30.23	-5.01	169.88
145	0.00	33.14	-6.01	166.47
150	0.00	35.82	-6.85	163.61
155	0.00	38.20	-7.55	161.26
160	0.00	40.26	-8.12	159.37
165	0.00	41.93	-8.56	157.41
170	0.00	43.16	-8.88	156.38
175	0.00	43.92	-9.07	155.76
180	0.00	44.18	-9.13	155.55

COMSEARCH

Earth Station Data Sheet

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

Coordination Values	**HAGERSTOWN, MD**	
Licensee Name	Intelsat License LLC	
Latitude (NAD 83)	39° 35' 54.0" N	
Longitude (NAD 83)	77° 45' 33.0" W	
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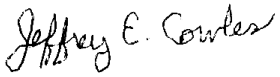
Antenna Centerline (AGL)	9.45 m / 31.0 ft	
Antenna Model	TIW 14.2 Meter	
Antenna Mode	Transmit 18.0 GHz	
Interference Objectives: Long Term	-154.0 dBW/4 kHz	20%
Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	-0.4 (dBW/4 kHz)	

			Transmit 18.0 GHz	
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
185	0.00	43.92	-9.07	155.76
190	0.00	43.16	-8.88	156.38
195	0.00	41.93	-8.56	157.41
200	0.00	40.26	-8.12	159.37
205	0.00	38.20	-7.55	161.26
210	0.00	35.81	-6.85	163.62
215	0.00	33.14	-6.01	166.47
220	0.00	30.22	-5.01	169.89
225	0.00	27.11	-3.83	173.98
230	0.00	23.83	-2.43	178.90
235	0.00	20.42	-0.75	184.91
240	0.00	16.89	1.31	192.44
245	0.00	13.28	3.92	202.03
250	0.00	9.59	7.46	216.01
255	0.00	6.33	11.96	312.84
260	0.00	6.11	12.35	426.25
265	0.00	9.18	7.93	217.91
270	0.00	13.46	3.77	201.46
275	0.00	18.11	0.55	189.65
280	0.00	22.90	-2.00	180.44
285	0.00	27.76	-4.09	173.08
290	0.00	32.66	-5.85	167.00
295	0.00	37.59	-7.38	161.85
300	0.00	42.53	-8.72	156.90
305	0.00	47.48	-9.91	153.03
310	0.00	52.44	-10.00	152.75
315	0.00	57.40	-10.00	152.75
320	0.00	62.37	-10.00	152.75
325	0.00	67.34	-10.00	152.75
330	0.00	72.31	-10.00	152.75
335	0.00	77.28	-10.00	152.75
340	0.00	82.26	-10.00	152.75
345	0.00	87.23	-10.00	152.75
350	0.00	92.21	-10.00	152.75
355	0.00	97.18	-10.00	152.75

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 23, 2012

EXHIBIT C

INTELSAT LICENSE LLC

SPECIAL TEMPORARY AUTHORITY REQUEST

EARTH STATION KA258

LEOP SERVICES FOR ASTRA-2F SATELLITE

August 24, 2012

Prepared By

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Temporary Transmit/Receive Earth Station
Operation Dates: 09/05/2012 – 11/05/2012

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 30, 2012.

Company

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ALLEGANY COUNTY GOVERNMENT
APC Realty and Equipment CO LLC
ARLINGTON COUNTY EMERGENCY COMM CTR
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AT&T CORP
Airband Communications Inc
B.F. SAUL COMPANY
BUSINESS INFORMATION GROUP, INC.
Believe Wireless, LLC
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CAMP HILL SCHOOL DISTRICT
CBS Broadcasting Inc
CECIL COUNTY PUBLIC SCHOOLS
CNG Transmission Corporation
CRISPUS ATTUCKS ASSOCIATION
Calvert County Government
Cambria, County of
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City of Altoona
Clearwire Spectrum Holdings III, LLC
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Conterra Ultra Broadband, LLC
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Company (Continued)

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Federal Communications Commission
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George Washington University
Glenville State University
HALIFAX AREA SCHOOL DISTRICT
Harrison County Emergency Services
Hope Gas, Inc.
Kreider Networks
LANCASTER GENERAL HOSPITAL
Last Mile Inc.
Loudoun Wireless LLC
Loudoun, County of
MARYLAND, STATE OF - MDOT - MTA
MLS ENGINEERING
MetroPCS AWS, LLC
NBC TELEMUNDO LICENSE LLC
NEXSTAR BROADCASTING, INC.
National Radio Astronomy Observatory
Netrepid, Inc.
New Cingular Wireless PCS LLC - AZ
New Cingular Wireless PCS LLC - DC
New Cingular Wireless PCS LLC- WV/NC/SC
New Cingular Wireless PCS, LLC - PA
Nextlink Wireless, LLC
Northern York County School District
PENNSYLVANIA MICROWAVE NETWORK INC.
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Red Zebra Broadcasting Licensee, LLC
Roadstar Internet, Inc.
SHIPPENSBURG AREA SCHOOL DISTRICT
SOMERSET COUNTY
SUSQUEHANNA TOWNSHIP SCHOOL DISTRICT
Shenandoah Personal Communications Co
Sprint Spectrum, LP
State of WV DHHR/BPH STECS
Steelton-Highspire School District
Telecom Transport Management, Inc
Turtle Networks 6444
WASHINGTON CABLE SYSTEMS INC
WINEMILLER COMMUNICATIONS, INC.
WKYSFM, INC
Washington Metro Area Transit Police Dep

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West Virginia PCS Alliance, L.C.
Western PA Internet Access, Inc.
Windstream D&E Systems, Inc.
Wireless Internetwork LLC
World Class Wireless LLC
York County Dept of Emergency Services
York Water Co

Society of Broadcast Engineers Coordinators

Maryland & DC – James Snyder
Pennsylvania – Central (Rick Markey)
Pennsylvania – SE, Delaware, and S. New Jersey (Jeff DePolo)
Pennsylvania – S. Central (Matt Lightner)
Pennsylvania – Western/Pittsburgh (Otto Schellin)
West Virginia – Entire State (Randy Kerbawy)

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Licensee Code	INTELS
Licensee Name	Intelsat License LLC

Site Information — HAGERSTOWN, MARYLAND

Venue Name	
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Longitude (NAD 83)	77° 45' 33.0" W
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Rain Zone	2
Ground Elevation (AMSL)	174.65 m / 573.0 ft

Link Information

Satellite Type	Geostationary
Mode	TO - Transmit-Only
Modulation	Digital
Satellite Arc	6° W to 149° West Longitude
Azimuth Range	101.9° to 257.8°
Corresponding Elevation Angles	5.3° / 5.7°
Antenna Centerline (AGL)	9.45 m / 31.0 ft

Antenna Information — Transmit

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Model		14.2 Meter
Gain / Diameter		65.1 dBi / 14.2 m
3-dB / 15-dB Beamwidth		0.10° / 0.20°
Max Available RF Power	(dBW/4 kHz)	-0.4
	(dBW/MHz)	23.6
Maximum EIRP	(dBW/4 kHz)	64.7
	(dBW/MHz)	88.7
	(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 18.0 GHz

Emission / Frequency Range (MHz)	832KFXD / 18088.5
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165	0.00	41.93	-8.56	157.41
170	0.00	43.16	-8.88	156.38
175	0.00	43.92	-9.07	155.76
180	0.00	44.18	-9.13	155.55
185	0.00	43.92	-9.07	155.76

COMSEARCH

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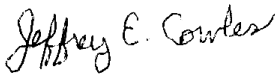
Ground Elevation (AMSL)	174.65 m / 573.0 ft	
Antenna Centerline (AGL)	9.45 m / 31.0 ft	
Antenna Model	TIW 14.2 Meter	
Antenna Mode	Transmit 18.0 GHz	
Interference Objectives: Long Term	-154.0 dBW/4 kHz	20%
Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	-0.4 (dBW/4 kHz)	

Transmit 18.0 GHz

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
190	0.00	43.16	-8.88	156.38
195	0.00	41.93	-8.56	157.41
200	0.00	40.26	-8.12	159.37
205	0.00	38.20	-7.55	161.26
210	0.00	35.81	-6.85	163.62
215	0.00	33.14	-6.01	166.47
220	0.00	30.22	-5.01	169.89
225	0.00	27.11	-3.83	173.98
230	0.00	23.83	-2.43	178.90
235	0.00	20.42	-0.75	184.91
240	0.00	16.89	1.31	192.44
245	0.00	13.28	3.92	202.03
250	0.00	9.59	7.46	216.01
255	0.00	6.33	11.96	312.84
260	0.00	6.11	12.35	426.25
265	0.00	9.18	7.93	217.91
270	0.00	13.46	3.77	201.46
275	0.00	18.11	0.55	189.65
280	0.00	22.90	-2.00	180.44
285	0.00	27.76	-4.09	173.08
290	0.00	32.66	-5.85	167.00
295	0.00	37.59	-7.38	161.85
300	0.00	42.53	-8.72	156.90
305	0.00	47.48	-9.91	153.03
310	0.00	52.44	-10.00	152.75
315	0.00	57.40	-10.00	152.75
320	0.00	62.37	-10.00	152.75
325	0.00	67.34	-10.00	152.75
330	0.00	72.31	-10.00	152.75
335	0.00	77.28	-10.00	152.75
340	0.00	82.26	-10.00	152.75
345	0.00	87.23	-10.00	152.75
350	0.00	92.21	-10.00	152.75
355	0.00	97.18	-10.00	152.75

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.



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DATED: August 23, 2012