

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
STA Request for Earth Station E4132

I. 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		



File # SES-STA-20121126-01043
E4132
Call Sigr. Grant Date 12-7-12
(or other identifier)
Term Dates
From 12-7-12 To 1-4-13
Approved: Susan H. Crandall
with conditions

Applicant: Intelsat License LLC
Call Sign: E4132
File No.: SES-STA-20121126-01043

Special Temporary Authority

Intelsat License LLC is granted Special Temporary Authority (STA), to operate its earth station Call Sign E4132 located in Fillmore, CA, to provide launch and early orbit phase services for the Yamal-402 satellite that is expected to be launched on December 8, 2012. The permanent orbital location for Yamal-402, which is licensed by the Russian Federation, will be 55.0° E.L. This STA is granted under the following conditions:

1. The Intelsat TT&C operations with Yamal-402 will be performed on center frequencies 6420.0 MHz (LHCP) and 6421.5 MHz (RHCP) (Earth-to-space) and 3931.5 MHz and 3401.0 MHz (LHCP); 4011.5 MHz and 3409.5 MHz (RHCP) (space-to-Earth).
2. Intelsat will coordinate with operators of co-frequency satellites in the drift path.
3. Operations in the uplink frequencies will be within the coordinated parameters of the coordination report submitted with this application
4. Operations, 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.
5. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future Intelsat License LLC applications.
6. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat License LLC's risk.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective immediately.



File # SES-STA-20121126-01043

Call Sign E4132 Grant Date 12-7-12
(or other identifier)

Term Dates
From 12-7-12 To: 1-6-13

Approved: Paul E. Blair

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? <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other (please explain):	
4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station	
5. Type Request <input type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> 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.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.) Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, from December 8, 2012 through January 6, 2013, to use its Fillmore, California C-band earth station, call sign E4132, to provide launch and early orbit phase services to the Yamal-402 satellite that is expected to be launched on December 8, 2012.	
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. Yes <input checked="" type="radio"/> No <input type="radio"/>	
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.

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.

December 7, 2012



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

Re: Supplement to Request for Special Temporary Authority
Fillmore, California Earth Station E4132
File No. SES-STA-20121126-01043

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat"), pursuant to Section 1.65 of the FCC's rules,¹ herein supplies a corrected first page of its above referenced request for Special Temporary Authority ("STA") for 30 days, from December 8, 2012 through January 6, 2013, to use its Fillmore, California C-band earth station -- call sign E4132 -- to provide launch and early orbit phase ("LEOP") services to the Yamal-402 satellite that is expected to be launched on December 8, 2012.² For the Commission's convenience, the entire corrected request is attached.

Intelsat respectfully seeks an expedited grant of the request, for the reasons set forth therein.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Susan H. Crandall".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Paul Blais

¹ 47 C.F.R. §1.65.

² See Intelsat Request for Special Temporary Authority, File No. SES-STA-20121126-01043.

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 Yamal-402 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 Yamal-402 satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with Telespazio, the LEOP mission manager hired by the manufacturer of the Yamal-402 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 Yamal-402 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 path", which starts immediately following its separation from a launch vehicle, and ends when the satellite reaches its geostationary orbital

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.

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 10 days of LEOP services to the Yamal-402 satellite.

It is Intelsat’s understanding that Yamal-402 is licensed by the Russian Federation, which is a WTO-member country. It is also Intelsat’s understanding that at its permanent orbital location of 55.0° E.L., Yamal-402 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 Yamal-402 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 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: 12/07/2012 - 01/20/2013

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 November 11, 2012.

Company

ABC Holding Company Inc.
ANAHEIM CITY, COMMUNICATIONS DIVISION
AT&T California
AirSites2000, LLC
American Tower, LLC
BNSF Railway Company
Bishop Union High School
CCO SoCal I, LLC
CNG Communications, Inc.
COAST COMMUNITY COLLEGE DISTRICT
California, State of
Calvary Chapel of Costa Mesa
Cellco Partnership - California
Chevron USA Inc.
City Of Los Angeles, Dept Water & Power
Coachella Valley Water District
DRS Technical Services
Ducor Telephone Company
Entravision Holdings, LLC
Exxon Communications Company
Federal Communications Commission
Fresno MSA Limited Partnership
Fresno, County of
GTE Mobilnet of California LTD Partnersh
GTE Mobilnet of Santa Barbara LTD Ptsh
Gila Electronics of Yuma, Inc
Goff, Wayne C.

Company (Continued)

KERN COMMUNITY COLLEGE DISTRICT BAKERSFI
KERN COUNTY SUPERINTENDENT OF SCHOOLS
KERN ED TELECOM CONSORTIUM
KTLA INC
Kern, County of
Kings County Office of Education
LOS ANGELES UNIFIED SCHOOL DISTRICT
Los Angeles City Info Technology Agency
Los Angeles County Dept of Public Works
Los Angeles County FCC Licensing Section
Los Angeles SMSA Ltd. Partnership
MHO Networks
MOBILE RELAY ASSOCIATES INC
MONTEBELLO CITY CALIFORNIA
Metropolitan Water Dist of So California
New Cingular Wireless PCS - Los Angeles
New Cingular Wireless PCS LLC - N CAL
New Cingular Wireless PCS LLC -San Diego
Nextel of California Inc.
Nextweb Inc
OCCIDENTAL OF ELK HILLS INC
ORANGE, COUNTY OF, CA
Pacific Gas and Electric Company
Paramount Farming Company, LLC.
Plains Exploration & Production Company
QUALCOMM INC.
Regents of the University of California
Regional 3Cs
Riverside, County of
SAN DIEGO, CITY OF
SAN LUIS OBISPO COUNTY
San Bernardino County of California
San Diego County
San Diego Gas & Electric Company
Santa Barbara Cellular Systems, Ltd.
Skyriver Communications
Southern California Edison Company
Southern California Gas Company
Southern California Regional Rail Auth.
T-Mobile License LLC
TULARE, COUNTY OF
TV MICROWAVES CO
Turn Wireless, LLC
University of California,HPWREN
Ventura, County of
Verizon California Inc.
Verizon Wireless (VAW) LLC (CA)
Vintage Production California LLC

Company (Continued)

WWC License L.L.C. - California
Western Pacific Mobile Microwave
Western Technical Services
unWired Broadband, 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: 11/21/2012
Job Number: 121111COMSJC01

Administrative Information

Status: TEMPORARY (Operation from 12/07/2012 to 01/20/2013)
Call Sign: TEMP01
Licensee Code: INTELS
Licensee Name: Intelsat License LLC

Site Information

FILLMORE, CALIFORNIA
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: Digital
Minimum Elevation Angle: 5.0°
Azimuth Range: 0.0° to 360°
Antenna Centerline (AGL): 8.23 m / 27.0 ft

Antenna Information

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

Transmit

Max Available RF Power (dBW/4 kHz): 10.9
(dBW/MHz): 34.9
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

Emission / Frequency Range (MHz):
850KFXD / 6420.0
850KFXD / 6421.5

Transmit 6.1 GHz

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 6.1 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 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	9.45	76.90	-10.00	256.40
5	9.81	73.28	-10.00	256.40
10	11.84	70.32	-10.00	256.40
15	10.91	66.54	-10.00	256.40
20	12.89	64.07	-10.00	256.40
25	13.83	61.45	-10.00	256.40
30	11.05	56.89	-10.00	256.40
35	11.05	53.97	-10.00	256.40
40	11.16	51.36	-10.00	256.40
45	12.08	49.66	-10.00	256.40
50	12.02	47.53	-10.00	256.40
55	12.02	45.80	-10.00	256.40
60	11.89	44.32	-10.00	256.40
65	10.13	41.66	-10.00	256.40
70	10.13	41.15	-10.00	256.40
75	10.13	41.13	-7.96	269.20
80	8.91	40.41	-4.20	292.90
85	8.91	41.41	0.77	324.20
90	6.32	40.56	4.53	347.90
95	6.32	42.59	4.53	347.90
100	6.32	45.00	4.53	347.90
105	6.35	47.76	4.53	347.90
110	5.84	50.44	4.53	347.90
115	4.00	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	2.62	67.23	4.53	347.90
140	2.67	71.27	4.53	347.90
145	2.87	75.38	4.53	347.90
150	2.62	79.46	4.53	347.90
155	3.19	83.65	4.53	347.90
160	2.85	87.77	4.53	347.90
165	3.52	91.91	4.53	347.90
170	3.28	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

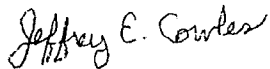
19700 Janelia Farm Boulevard, Ashburn, VA 20147
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Antenna Model	Scientific-Atlanta 10.3 Meter	
Antenna Mode	Transmit 6.1 GHz	
Interference Objectives:	Long Term	-154.0 dBW/4 kHz 20%
	Short Term	-131.0 dBW/4 kHz 0.0025%
Max Available RF Power	10.9 (dBW/4 kHz)	

			Transmit 6.1 GHz	
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
185	2.35	108.51	4.53	347.90
190	2.28	112.57	4.53	347.90
195	0.78	117.05	4.53	347.90
200	0.41	121.18	4.53	347.90
205	1.23	124.74	4.53	347.90
210	0.97	128.61	4.53	347.90
215	0.94	132.22	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	2.93	134.56	-7.96	269.20
290	4.19	130.57	-10.00	256.40
295	4.04	127.29	-10.00	256.40
300	4.42	123.56	-10.00	256.40
305	3.72	120.18	-10.00	256.40
310	3.09	116.58	-10.00	256.40
315	2.76	112.74	-10.00	256.40
320	3.33	108.58	-10.00	256.40
325	4.75	104.28	-10.00	256.40
330	5.93	100.12	-10.00	256.40
335	7.78	95.99	-10.00	256.40
340	8.25	92.08	-10.00	256.40
345	9.31	88.23	-10.00	256.40
350	9.65	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: November 21, 2012