

E4132 SES-STA-20130801-00680 IE2013001682
Intelsat License 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:
Request for STA for 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		

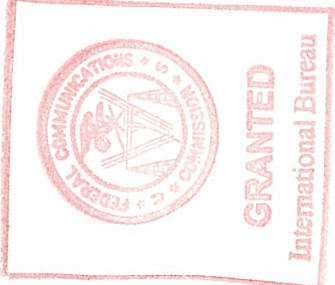
30days "With Conditions"

Filed SES-STA-20130801-00680

Call Sign E4132 Grant Date 08/20/2013
(or other identifier) Team Dates

From 08/23/2013 To 09/21/2013

Approved: [Signature]



Applicant: Intelsat License LLC
Call Sign: E4132
File Nos.: SES-STA-20130801-00680

Intelsat License LLC (Intelsat) is granted special temporary authority under the following conditions for 30 days from August 23, 2013 for the fixed earth station Call Signs E4132, located at Fillmore, California to provide launch and early orbit phase (LEOP) services to the Indian Space Research Organizations (ISRO) GSAT-7 satellite, licensed by the India Administration, at the 74.0 E.L. orbital location. LEOP operations will be performed on the following center frequencies: 6415.0 MHz and 6412.912 MHz (RHCP) (Earth-to-space) and 4186.848 MHz, and 4189.344 MHz (LHCP) (space-to-Earth). The transmitted EIRP will be 88.0 dBW.

1. All operations under this grant of STA shall be on an unprotected and non-harmful interference basis. Intelsat shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
2. In the event of any harmful interference as a result of operations under this grant of ST A, Intelsat shall cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.
3. Grant of this authorization is without prejudice to any determination that the Commission may make regarding future or pending Intelsat applications.
4. The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path. 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 GSAT-1 LEOP mission is as follows:
 - (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

This grant is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.P.R. § 0.261, and is effective upon release.


30 days *"With conditions"*

File # SES-STA-20130801-00680

Call Sign E4132 Grant Date 08/20/2013
(or other identifier)

Term Dates
From 08/23/2013 To 09/21/2013

Approved: *Paul E. Blawie*



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.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;"> <p>Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days commencing August 24, 2013 to use its Fillmore, California C-band earth station, call sign E4132, to provide launch and early orbit phase services for the GSAT-7 satellite that is expected to be launched on August 24, 2013.</p> </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"; 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

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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.

August 1, 2013

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 commencing August 24, 2013 to use its Fillmore, California C-band earth station -- call sign E4132 -- to provide launch and early orbit phase (“LEOP”) services for the GSAT-7 satellite that is expected to be launched on August 24, 2013.² The LEOP period is expected to last approximately 10 days.³

The GSAT-7 LEOP operations will be performed in the following frequency bands:

Uplink: 6415.0 MHz and 6412.912 MHz (RHCP); and
Downlink: 4186.848 MHz and 4189.344 MHz (LHCP).

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.

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 The GSAT-7 satellite will be in-orbit tested at its permanent orbital location of 74.0° E.L.

³ Intelsat is seeking authority for 30 days to accommodate a possible launch delay.

⁴ The Indian Space Research Organisation (“ISRO”), which is the manufacturer of, and LEOP mission manager for, GSAT-7, will handle the coordination.

Ms. Marlene H. Dortch
August 1, 2013
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The 24x7 contact information for the GSAT-7 LEOP mission is as follows:

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 of this request, Intelsat is attaching Exhibits A and B, which contain 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, as well as a waiver request. 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 GSAT-7 LEOP mission, it is seeking to operate in the frequencies listed in the request at a maximum input power level not to exceed 26.5 dBW. The technical information submitted with the STA request reflects a higher maximum input power level of 34.0 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.

Finally, Intelsat clarifies that during the GSAT-7 launch, the spacecraft will be controlled by ISRO, which is the manager of the LEOP mission. ISRO will build and send the commands to the Intelsat antenna, which will process and execute the commands. Telemetry received by Intelsat will be forwarded to ISRO. Intelsat will remain in control of the baseband unit, RF equipment and antenna.

Grant of this STA request will enable Intelsat to help launch the GSAT-7 satellite. This, in turn, will serve the public interest by providing new capacity at the satellite's permanent location of 74.0° E.L.

Ms. Marlene H. Dortch
August 1, 2013
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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". The signature is fluid and cursive, with a large initial "S" and "C".

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Paul Blais

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.²

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.³ The Commission may grant a waiver for good cause shown.⁴ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁵ 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.⁶ 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 GSAT-7 satellite. The information sought by Section 25.114 is not relevant to LEOP services. Moreover, Intelsat does not have such information because Intelsat is not the operator of the GSAT-7 satellite. Rather, an affiliate of Intelsat has a contract with the Indian Space Research Organisation, the manufacturer and operator of the GSAT-7 satellite, to conduct LEOP services for the satellite.

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

² See *EchoStar Satellite Operating Company Application for Special Temporary Authority Related to Moving the EchoStar 6 Satellite from the 77° W.L. Orbital Location to the 96.2° W.L. Orbital Location, and to Operate at the 96.2° W.L. Orbital Location*, DA 13-593, File No. SAT-STA-20130220-00023 (released Apr. 1, 2013) (noting that operating TT&C earth stations in the United States with a foreign-licensed satellite does not constitute "DBS service").

³ 47 C.F.R. §§ 25.137 and 25.114.

⁴ 47 C.F.R. §1.3.

⁵ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

⁶ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

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 GSAT-7 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 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 Intelsat does not possess the information, 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.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 ten days of LEOP services to the GSAT-7 satellite.

It is Intelsat’s understanding that GSAT-7 is licensed by India, which is a WTO-member country. It is also Intelsat’s understanding that at 74.0° E.L., GSAT-7 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 GSAT-7 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.

⁷ See 47 C.F.R. §25.137(d)(4).