

July 7, 2014

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



Re: Request for Extension of Special Temporary Authority
Hagerstown, Maryland Earth Station KA275

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days— from July 11, 2014 through August 9, 2014— of the Special Temporary Authority ("STA")¹ previously granted Intelsat to use its Hagerstown, Maryland C-band earth station -- call sign KA275 -- to provide launch and early orbit phase ("LEOP") services for the AsiaSat-8 satellite that currently is expected to be launched in early August after a two-month delay.² The LEOP period is expected to last approximately ten days.³

The AsiaSat-8 LEOP operations will be performed in the following frequency bands: 6425.00 MHz and 6429.50 MHz in the uplink (RHCP), and 4198.7 MHz and 4199.4 MHz in the downlink (LHCP). 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 AsiaSat-8 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.

¹ Intelsat has filed this STA request, an FCC Form 159 and an \$[195.00] filing fee electronically via the International Bureau's Filing System.

² See *Satellite Communications Services Information; Actions Taken*, Report No. SES-01651, File No. SES-STA-20140512-00342 (May 28, 2014) (Public Notice). The permanent orbital location for AsiaSat-8, which Intelsat understands is licensed by China, will be 105.3° E.L. The in-orbit testing location will be 105.3° E.L.

³ Intelsat likely will seek further extension of the STA given the current uncertainty regarding the launch date.

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In support of this further request, Intelsat incorporates by reference the materials submitted with its original STA request, 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 transmission to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

Intelsat also notes that for purposes of the AsiaSat-8 LEOP mission, it is seeking to operate in the frequencies listed in this request at power levels not to exceed 25.5 dBW. The technical information submitted with the original STA request reflects a power level as high as 28.8 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 AsiaSat-8 launch, the spacecraft will be controlled by Space Systems/Loral, which is the manager of the LEOP mission. Space Systems/Loral 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 Space Systems/Loral. Intelsat will remain in control of the baseband unit, RF equipment and antenna.

Grant of this STA extension request will allow Intelsat to help launch the AsiaSat-8 satellite. This, in turn, will help ensure continuity of service at the 105.3° E.L. orbital location and thereby promotes the public interest.

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

Respectfully submitted,



Susan H. Crandall
Associate General Counsel
Intelsat Corporation

cc: Paul Blais