

September 2, 2014

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

> Re: Request for Special Temporary Authority Riverside, California Earth Station E040125

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, commencing October 8, 2014, to use its Riverside, California C-band earth station—call sign E040125—to provide launch and early orbit phase ("LEOP") services for the Indian Regional Navigational Satellite System ("IRNSS") 1C satellite. IRNSS-1C is expected to be launched no earlier than October 8, 2014.² The LEOP period is expected to last approximately 10 days.³

The IRNSS-1C LEOP operations will be performed in the following frequency bands: 6415.00 MHz and 6425.98 MHz in the uplink (CP), and 4194.864 MHz and 4198.560 MHz in the downlink (CP). 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 IRNSS-1C LEOP mission is as follows:

- Ph.: (703) 559-7701 East Coast Operations Center (primary)
 - (310) 525-5591 West Coast Operations Center (back-up)

Request to speak with Harry Burnham or Kevin Bell.

In further support of this request, Intelsat hereby attaches Exhibits A and B, which contain technical information that demonstrates that the operation of the earth station will be compatible with its

¹ Intelsat has filed its STA request, an FCC Form 159, a \$195.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

 $^{^2}$ The permanent orbital location for IRNSS-1C, which Intelsat understands is licensed by India, will be at 83.5° E.L. The in-orbit testing location will be 83.5° E.L.

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

⁴ Indian Space Research Organisation ("ISRO"), the manager of the IRNSS-1C LEOP mission, will handle the coordination.

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electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility, as well as a waiver request. Intelsat also notes that for purposes of the IRNSS-1C LEOP mission, it is seeking to operate in the frequencies listed in the request at power levels not to exceed 25.5 dBW. The technical information submitted with this STA request reflects a power level as high as 34.0 dBW because Intelsat might operate at this level in the event an emergency necessitates the use of a higher power level in order to command the satellite. 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.

Finally, Intelsat clarifies that during the IRNSS-1C launch, the ISRO will control the spacecraft. 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 allow Intelsat to help launch the IRNSS-1C satellite. This, in turn, will help provide navigation services to India and the neighboring areas from the 83.5° E.L. orbital location and thereby promotes the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

Cynthia J. Hady

Cynthia J. Grady Regulatory Counsel Intelsat Corporation

cc: Paul Blais