

**Exhibit B**  
**Intelsat License LLC**  
**Hagerstown, Maryland**  
**NEC 12.5 Meter Earth Station**  
**Call Sign: KA258**

**Compliance with FCC Report & Order (FCC 96-377) for the 13.75 - 14.0 GHz Band**  
**Analysis and Calculations**

**1. Background**

This Exhibit is presented to demonstrate the extent to which the Intelsat License LLC satellite earth station in Hagerstown, Maryland is in compliance with the Federal Communications Commission (“FCC”) Report & Order 96-377. The potential interference from the earth station to U.S. Navy shipboard radiolocation operations (RADAR) and the NASA space research activities in the 13.75 - 14.0 GHz band is addressed in this exhibit. The parameters for the earth station are:

**Table 1. Earth Station Characteristics**

- Coordinates (NAD83): 39° 35’ 54.0” N, 77° 45’ 33.0” W
- Satellite Location for Earth Station: ARSAT-1 at 5.0° W to 150.0° W
- Frequency Band: 13.75-14.5 GHz for uplink
- Polarizations: Circular
- Emissions: 816KF2D
- Modulation: FM
- Maximum Aggregate Uplink EIRP: 88.0 dBW for all Carriers
- Transmit Antenna Characteristics
  - Antenna Size: 14.2 meter in Diameter
  - Antenna Type/Model: TIW
  - Gain: 65.1 dBi
- RF power into Antenna Flange: 22.9 dBW or -0.2 dBW/ MHz (Maximum)
- Minimum Elevation Angle:
  - Hagerstown, Md. 5.5° @ 101.9° Az.
  - 5.7° @ 257.8° Az.
- Side Lobe Antenna Gain: 32 - 25\*log( $\theta$ )

Because the above uplink spectrum is shared with the Federal Government, coordination in this band requires resolution data pertaining to potential interference between the earth stations and both the U.S. Navy Department and NASA systems. Potential interference from the earth station could impact with the U.S. Navy and/or NASA systems in two areas. These areas are noted in FCC Report and Order 96-377, and consist of (1) Radiolocation and radio navigation, (2) Data Relay Satellites.

### Summary of Coordination Issues:

- 1) Potential Impact to Government Radiolocation (Shipboard Radar)
- 2) Potential Impact to NASA Data Relay Satellite Systems (TDRSS)

## **2. Potential Impact to Government Radiolocation (Shipboard Radar)**

Radiolocation operations (RADAR) may occur anywhere in the 13.4 - 14 GHz frequency band aboard ocean going U.S. Navy ships. The FCC Report & Order 96-377 allocates the top 250 MHz of this 600 MHz band to the Fixed Satellite Service (FSS) on a co-primary basis with the radiolocation operations and provides for an interference protection level of  $-167 \text{ dBW/m}^2/4 \text{ kHz}$ .

The closest distance to the shoreline from the Hagerstown earth station is approximately 131km south-east toward the Atlantic Ocean. The calculation of the power spectral density at this distance is given by:

- |                              |                       |
|------------------------------|-----------------------|
| 1. Clear Sky EIRP:           | 88.00 dBW             |
| 2. Carrier Bandwidth :       | 816 kHz               |
| 3. PD at antenna input:      | -0.2 dBW/4kHz         |
| 4. Transmit Antenna Gain:    | 65.1 dBi              |
| 5. Antenna Gain Horizon:     | FCC Reference Pattern |
| 6. Antenna Elevation Angles: | 5°                    |

The earth station will radiate interference toward the ocean according to its off-axis side-lobe performance. A conservative analysis, using FCC standard reference pattern, results in off-axis antenna gains of 12.3 dBi towards the Atlantic Ocean.

The signal density at the shoreline, through free space is:

$$\begin{aligned} \text{PFD} &= \text{Antenna Feed Power density (dBW/4kHz)} + \text{Antenna Off-Axis Gain (dBi)} - \text{Spread Loss (dB-m}^2\text{)} \\ &= -0.2 \text{ dBW/4kHz} + 12.3 \text{ dBi} - 10 \cdot \log[4\pi \cdot (131000\text{m})^2] \\ &= -102.2 \text{ dBW/ m}^2/4 \text{ kHz} + \text{Additional Path Losses (}\sim\text{69.0 dB)} \end{aligned}$$

Our calculations indicate additional path loss of approximately 69.0 dB including absorption loss and earth diffraction loss for the actual path profiles from the earth station to the nearest shoreline.

The calculated PFD, including additional path losses to the closest shoreline, is  $-170.2 \text{ dBW/m}^2/4 \text{ kHz}$ . This is 3.2 dB below the  $-167 \text{ dBW/m}^2/4 \text{ kHz}$  interference criteria of the FCC Report & Order 96-377. Therefore, there should be no interference to the U.S. Navy RADAR from the Hagerstown earth station due to the distance and the terrain blockage between the site and the shore.

### **3. Potential Impact to NASA's Tracking and Data Relay Satellite System (TDRSS)**

The geographic location of the Intelsat License LLC earth station in Hagerstown, Maryland is outside the 390 km radius coordination contour surrounding NASA's White Sands, New Mexico ground station complex. Therefore, the TDRSS space-to-earth link will not be impacted by the Intelsat License LLC earth station in Hagerstown, Maryland.

The transmissions from the Intelsat License LLC earth station in Castle Rock, Colorado will not overlap with the 13.75-13.8 GHz band. Therefore, the TDRSS forward space-to-space link (TDRSS forward link-to-LEO) will not be impacted by the Intelsat License LLC earth station in Hagerstown, Maryland.

### **4. Coordination Result Summary and Conclusions**

The results of the analysis and calculations performed in this exhibit indicate that compatible operation between the earth station at the Hagerstown, Maryland facility and the U.S. Navy and NASA systems space-to-earth link are possible. These analyses have been based on the assumption of 816 kHz bandwidth carriers. No interference to U.S. Navy RADAR operations, TDRSS space-to-earth link, or TDRSS space-to-space link will occur from the Hagerstown, Maryland site earth station.