

September 22, 2014

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

Re: Request for Special Temporary Authority
Nuevo, California Earth Station E060384

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, from October 25, 2014 through November 24, 2014, to use its Nuevo, California Ku-band earth station—call sign E060384—to provide telemetry, tracking and control (“TT&C”) services for the Intelsat 30 satellite at 132.0° W.L. while the satellite undergoes in-orbit testing (“IOT”), as well as during the satellite’s drift to its permanent location of 95.05° W.L.² Intelsat 30 is expected to be launched on October 16, 2014.

Upon launch and subject to receipt of FCC approval, Intelsat 30 will be located temporarily at 132.0° W.L. for IOT.³ The satellite’s permanent location will ultimately be 95.05° W.L.⁴ The Intelsat 30 TT&C operations will be performed in the following frequencies: 13750.5 MHz and 14003.50 MHz (LHCP) in the uplink and 11198.0 MHz, 11198.5 MHz, 11199.25 MHz, and 11199.75 MHz (RHCP) in the downlink.

The proposed operations will be coordinated with all operators of satellites that use the same frequency bands and are in the drift path or are potentially affected by these operations at the IOT location. To Intelsat’s knowledge, there are no co-frequency satellites within plus/minus six degrees of 132.0° W.L. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

In further support of this request, Intelsat hereby attaches Exhibit A, which contains 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 See *Policy Branch Information; Actions Taken*, Report No. SAT-01036, File Nos. SAT-LOA-20121025-00187 and SAT-AMD-20121221-00220 (Aug. 15, 2014) (Public Notice).

³ See *Intelsat License LLC Request for Special Temporary Authority to Conduct In-Orbit Testing of the Intelsat 30 Satellite*, File No. SAT-STA-20140919-00102 (filed Sept. 19, 2014).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-01036, File Nos. SAT-LOA-20121025-00187 and SAT-AMD-20121221-00220 (Aug. 15, 2014) (Public Notice).

electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility. 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 Intelsat 30 mission, it is seeking to operate in the frequencies listed in this request at power levels not to exceed 28.7 dBW.

In addition, out of an abundance of caution, in order to perform TT&C during IOT on the 11198.0 MHz, 11198.5 MHz, 11199.25 MHz, and 11199.75 MHz frequencies, this application for STA requests a waiver of the footnote NG52 to the U.S. Table of Frequency Allocations, which limits the use of the 10700-11700 MHz frequency band to “international systems.”⁵ Intelsat seeks waiver to permit the Nuevo, California earth station E060384 to communicate with the Intelsat 30 satellite at 132.0° W.L. for the limited purposes of IOT and drift to Intelsat’s permanent location at 95.05° W.L.

The Commission may grant a waiver for good cause shown.⁶ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁷ 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.⁸ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists here to grant a waiver allowing E060384 to provide TT&C during IOT of the Intelsat 30 satellite using frequencies in the 10950-11200 MHz band. IOT and the drift of the satellite will only be for a short duration. In addition, as explained above, the proposed operations will be coordinated with all operators of satellites that use the same frequency bands and are in the drift path or are potentially affected by these operations at the IOT location. To Intelsat’s knowledge, there are no co-frequency satellites within plus/minus six degrees of 132.0° W.L.

The provision of TT&C services to the Intelsat 30 satellite at 132.0° W.L., during drift, and at 95.05° W.L. is a critical step in ensuring that the satellite will be fully operational at 95.05° W.L. This, in turn, will ensure continuity of service to customers at the 95.05° W.L. location, and thereby promotes the public interest.

⁵ See 47 C.F.R. § 2.106 fn. NG52.

⁶ 47 C.F.R. §1.3.

⁷ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

⁸ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

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

Respectfully submitted,

A handwritten signature in blue ink that reads "Cynthia J. Grady". The signature is written in a cursive style with a long, sweeping tail on the "y".

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

Cc: Paul Blais