

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Request for Special Temporary Authority Using Castle Rock, Colorado Earth Station KL92

1. Applicant

Name:	Intelsat License LLC	Phone Number:	703-559-7848
DBA Name:		Fax Number:	703-559-8539
Street:	c/o Intelsat Corporation 7900 Tysons One Place	E-Mail:	susan.crandall@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
Attention:	Susan H. Crandall		



SES-STA-20141030-00831
Call Sign KL92 Grant Date 12-4-14
(or other identifier)
Term Dates From 12-4-14 To 1-3-15
Approved: [Signature] place
with conditions

Applicant: Intelsat License LLC
Call Sign: KL92
File No.: SES-STA-20141030-00831
Special Temporary Authority (STA)

Intelsat License LLC ("Intelsat") is granted STA for 30 days for earth station KL92 at Castle Rock, Colorado at 39° 16' 38.0" N/104° 48' 25" W.L. (NAD-83) to operate with telemetry, tracking, and control frequencies with Intelsat 30 satellite (Call Sign S2887) at orbital location 95.05° W.L. under the following conditions:

1. Uplink (Earth-to-space) frequencies for command functions on 13750.50 MHz and 14003.50 MHz (RHCP) within the operating parameters of its pending application IBFS File No. SES-MOD-20141030-00834 that are subject to coordinated emission and power limits.
2. Downlink (space-to-Earth) frequencies for telemetry functions on 11198.00 MHz, 11198.50 MHz, 11199.25 MHz, and 11199.75 MHz (RHCP) within the operating parameters of its pending application IBFS File No. SES-MOD-20141030-00834.
3. Grant of this STA is without prejudice to any determination that the Commission may make regarding its pending application IBFS File No. SES-MOD-20141030-00834 and without prejudice to any future Commission's action.
4. All operations under this grant of STA shall be on an unprotected and non-harmful interference basis. Intelsat's KL92 shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
5. In the event of any harmful interference as a result of operations under this grant of STA, Intelsat shall cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.
6. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat License LLC's risk.
7. This grant is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release.

 GRANTED International Bureau	File #	SES-STA-20141030-00831		
	Call Sign	KL92	Grant Date	12-4-14
	(or other identifier)			
	From	12-4-14	Term Dates To	1-3-15
Approved				

2. Contact			
Name:	Susan H. Crandall	Phone Number:	703-559-7848
Company:	Intelsat Corporation	Fax Number:	703-559-3957
Street:	7900 Tysons One Place	E-Mail:	susan.crandall@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
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?			
☒ If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).			
☐ Governmental Entity ☐ Noncommercial educational licensee			
☐ Other (please explain):			
4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station			
5. Type Request			
☐ Use Prior to Grant ☐ Change Station Location ☒ Other			
6. Requested Use Prior Date			
7. CityCastle Rock		8. Latitude (dd mm ss.s h) 39 16 38.0 N	

9. State	CO	10. Longitude (dd mm ss.s h)	104	48	25.0	W
11. Please supply any need attachments.						
Attachment 1: STA Request			Attachment 2:		Attachment 3:	
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.)						
Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, from November 20, 2014 through December 19, 2014, to utilize its Castle Rock, Colorado antenna, KL92, to operate in new Tracking, Telemetry, and Control frequencies with the Intelsat 30 satellite (Call sign S2887) at 95.05 W.L.						
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(h) for the meaning of "party to the application"; party to the application; for these purposes.						
14. Name of Person Signing		15. Title of Person Signing				
Cynthia J. Grady		Regulatory 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.

October 30, 2014

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

Re: Request for Special Temporary Authority to Utilize Castle Rock, Colorado Antenna, KL92, to Perform Tracking, Telemetry, and Control for Intelsat 30 Satellite
EXPEDITED TREATMENT REQUESTED

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, from November 20, 2014 through December 19, 2014, to utilize its Castle Rock, Colorado antenna, KL92, to operate in new Tracking, Telemetry, and Control ("TT&C") frequencies with the Intelsat 30 satellite (Call Sign S2887)² at 95.05° W.L. The proposed operations will be performed using the following frequencies: 13750.50 MHz and 14003.50 MHz in the uplink (RHCP), and 11198.00 MHz, 11198.50 MHz, 11199.25 MHz, and 11199.75 MHz in the downlink (RHCP). Intelsat will be filing an application for authority to use this antenna to transmit in these frequencies on a permanent basis.

In support of its request, Intelsat incorporates by reference its pending application for authority to use this antenna to transmit in these frequencies on a permanent basis.³ The application contains detailed technical information (in Exhibits A, C and D) 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. 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.

To the extent necessary, Intelsat also 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

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

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 Modification of Earth Station KL92*, File No. SES-MOD-INTR2014-02158 (filed Oct. 30, 2014).

systems.”⁴ Intelsat seeks waiver to permit the Castle Rock, Colorado earth station KL92 to communicate with the Intelsat 30 satellite at 95.05° W.L.

The Commission may grant a waiver for good cause shown.⁵ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁶ 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.⁷ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest. As shown below, good cause exists here to grant a waiver allowing the KL92 to provide TT&C services to the Intelsat 30 satellite using frequencies in the 10700-11700 MHz band.

Good cause exists to waive the international only requirements for the 10700-11700 MHz frequency band. The purpose of NG52 is to limit the number of the FSS service earth stations with which the co-primary fixed service would need to coordinate.⁸ Intelsat will provide services in the 10700-11700 MHz frequency band only on a non-interference/non-protected basis, and therefore will not need to coordinate with fixed service stations.

Moreover, grant of this waiver is consistent with the Commission’s precedent. A waiver of the Table of Allocations is generally granted “when there is little potential interference into any service authorized under the Table of Frequency allocations and when the nonconforming operator accepts any interference from authorized services.”⁹ The International Bureau has found that waiving the international only requirement would not undermine the purpose of the rules if the party seeking a waiver will be utilizing earth stations that are receive-only in these bands and thus “not capable of causing interference into FS stations” operating in the bands.¹⁰ KL92 will not transmit in the 10700-11700 MHz frequency band and Intelsat agrees to accept any level of interference into those earth stations from fixed service stations in the band. Accordingly, the earth stations operating in these bands pose no interference concerns with respect to co-frequency fixed service stations.

⁴ See 47 C.F.R. § 2.106 fn. NG52.

⁵ 47 C.F.R. §1.3.

⁶ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

⁷ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

⁸ See *Satellite Services*, 26 RR 2d 1257, 1263-65 (1973). See also *EchoStar KuX Corporation Application for Authority to Construct, Launch and Operate a Geostationary Satellite Using the Extended Ku-band Frequencies in the Fixed-Satellite Service at the 83° W.L. Orbital Location*, Order and Authorization, DA 04-3162, 9 (Int’l Bur., Sept. 30, 2004) (“*EchoStar 83° Waiver*”).

⁹ See *The Boeing Company*, Order and Authorization, 16 FCC Rcd 22645, 22651 (Int’l Bur. & OET 2001); *Application of Fugro-Chance, Inc. for Blanket Authority to Construct and Operate a Private Network of Receive-Only Mobile Earth Stations*, Order and Authorization, 10 FCC Rcd 2860 (Int’l Bur. 1995) (authorizing MSS in the C-band); see also *Application of Motorola Satellite Communications, Inc. for Modification of License*, Order and Authorization, 11 FCC Rcd 13952-13956 (Int’l Bur. 1996) (authorizing service to fixed terminals in bands allocated the mobile satellite service).

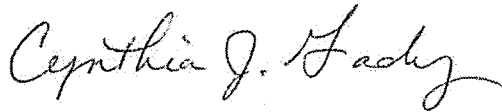
¹⁰ *EchoStar 83° Waiver*, ¶ 13.

Ms. Marlene H. Dortch
October 30, 2014
Page 3

The provision of TT&C services to the Intelsat 30 satellite 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.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this request.

Sincerely,

A handwritten signature in cursive script, reading "Cynthia J. Grady".

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais