Approved by OMB
3060–0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATIONEnter a description of this application to identify it on the main menu:
Request for STA Using Fillmore, California Earth Station E4132

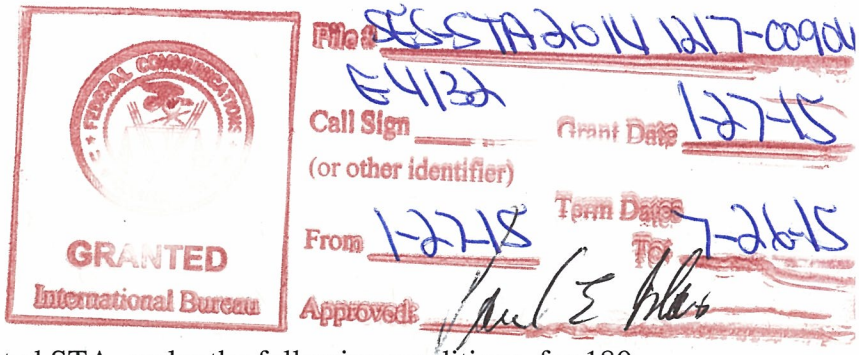
1. Applicant

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

GRANTED
International Bureau

File# SES-STA-20141217-00904
Call Sign E4132 Grant Date 1-27-15
(or other identifier)
Term Dates
From 1-27-15 To: 7-26-15
Approved: Paul E Hart

Applicant: Intelsat License LLC
Call Sign: E4132
File No.: SES-STA-20141217-00904
Special Temporary Authority (STA)



Intelsat License LLC ("Intelsat") is granted STA, under the following conditions, for 180 days for earth station E4132 at Fillmore, California at 34° 24' 22.00" NL/118° 53' 34.0"W.L. to provide launch and early orbit phase (LEOP) services for Eutelsat-115WB satellite at permanent orbital location 114.9° W.L., licensed by the Mexican administration. The in-orbit testing location will be 114.9 ° E.L. The launch is expected to be no earlier than February 1, 2015.

1. Uplink (Earth-to-space) frequencies will be on 6423.5 MHz and 6421.5 MHz (LHCP) within the coordinated emission and power limits.

2. Downlink (space-to-Earth) frequencies will be on 4199.0 MHz and 4199.8 MHz (LHCP).

3. The LEOP operations must 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. Currently the 24x7 contact information for the Eutelsat-115WB satellite 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.

4. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending or future Intelsat License LLC applications.

5. All operations under this grant of STA shall be on an unprotected and non-harmful interference basis. Intelsat's E4132 shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.

6. 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.

7. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat License LLC's risk.

8. 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.

2. Contact

Name:	Susan H. Crandall	**Phone Number:**	703–559–7848
Company:	Intelsat Corporation	**Fax Number:**	703–559–8539
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. CityFillmore	8. Latitude (dd mm ss.s h) 34 24 22.0 N

9. State CA	10. Longitude (dd mm ss.s h) 118 53 34.0 W

11. Please supply any need attachments.

Attachment 1: STA Request Attachment 2: Exhibit A Attachment 3: Exhibit B

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 180 days, commencing February 1, 2015, to use its Fillmore, California C-band earth station, call sign E4132, to provide launch and early orbit phase services for the Eutelsat-115WB satellite. Eutelsat-115WB is expected to be launched no earlier than February 1, 2015.

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(b) for the meaning of "party to the application" for these purposes.

◉ Yes ○ No

14. Name of Person Signing Cynthia J. Grady	15. Title of Person Signing 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

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD–PERM, Paperwork Reduction Project (3060–0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060–0678.

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.

Exhibit A

PETITION FOR WAIVER OF SECTIONS 25.137 AND 25.114

Pursuant to Section 25.137 of the Federal Communications Commission's ("Commission" or "FCC") rules, earth station applicants "requesting authority to operate with a non-U.S. licensed space station *to serve the United States*" must demonstrate that effective competitive opportunities exist and must provide the same technical information required by Section 25.114 for U.S.-licensed space stations.[1] Intelsat License LLC ("Intelsat") herein seeks authority to provide launch and early orbit phase ("LEOP") services—not commercial services—to the United States, and thus believes that Section 25.137 does not apply.[2]

To the extent the Commission determines, however, that Intelsat's request for authority to provide LEOP services on a special temporary basis is a request to serve the United States with a non U.S.-licensed satellite, Intelsat respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission's rules.[3] The Commission may grant a waiver for good cause shown.[4] The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.[5] 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.[6] Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause exists for a waiver of both Section 25.137 and Section 25.114. With respect to Section 25.114, Intelsat seeks authority only to provide LEOP services for the Eutelsat-115WB satellite. The information sought by Section 25.114 is not relevant to LEOP services. Moreover, Intelsat does not have—and would not easily be able to obtain—such information because Intelsat is not the operator of the Eutelsat-115WB satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with Boeing, the manufacturer of the Eutelsat-115WB satellite, to conduct LEOP services for the satellite.

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[1] 47 C.F.R. § 25.137 (emphasis added).

[2] *See EchoStar Satellite Operating Company Application for Special Temporary Authority Related to Moving the EchoStar 6 Satellite from the 77° W.L. Orbital Location to the 96.2° W.L. Orbital Location, and to Operate at the 96.2° W.L. Orbital Location*, DA 13-593, File No. SAT-STA-20130220-00023 (released Apr. 1, 2013) (noting that operating TT&C earth stations in the United States with a foreign-licensed satellite does not constitute "DBS service").

[3] 47 C.F.R. §§ 25.137 and 25.114.

[4] 47 C.F.R. §1.3.

[5] *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

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

The information that Intelsat is not including is not required to determine potential harmful interference. The Schedule S information for this satellite would pertain to the operation of the Eutelsat-115WB satellite at its final orbital location. However, the present application for LEOP services involves communications *prior* to the satellite attaining its final location in the geostationary orbit. In other words, during the LEOP mission, the earth station will not be communicating with a satellite located in the geostationary orbit. Rather, it will be transmitting to a satellite traveling on its "transfer orbit" or "LEOP path," which starts immediately following its separation from a launch vehicle, and ends when the satellite reaches its geostationary orbital location. Moreover, as with any STA, Intelsat will perform the LEOP services on a non-interference basis.

Because it is not relevant to the service for which Intelsat seeks authorization, and because obtaining the information would be a hardship, Intelsat seeks a waiver of all the information required by Section 25.114. Intelsat has provided in this STA request the required technical information that is relevant to the LEOP services for which Intelsat seeks authorization.

Good cause also exists to waive Section 25.137. Section 25.137 is designed to ensure that "U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services" in other countries. Here, there is no service being provided by the satellite; it is simply being placed in its orbital location after separating from the launch vehicle. Thus, the purpose of the information required by Section 25.137 is not implicated here. For example, Section 25.137(d) requires earth station applicants requesting authority to operate with a non-U.S.-licensed space station that is not in orbit and operating to post a bond.[7] The underlying purpose in having to post a bond—*i.e.*, to prevent warehousing of orbital locations by operators seeking to serve the United States—would not be served by requiring Intelsat to post a bond in order to provide approximately ten days of LEOP services to the Eutelsat-115WB satellite.

It is Intelsat's understanding that Eutelsat-115WB is licensed by Mexico, which is a WTO-member country. Thus, the purposes of Section 25.137—to ensure that U.S. satellite operators enjoy "effective competitive opportunities" to serve foreign markets and to prevent warehousing of orbital locations serving the United States—will not be undermined by grant of this waiver request.

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[7] *See* 47 C.F.R. §25.137(d)(4).

Prepared By

COMSEARCH
19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 http://www.comsearch.com

Prepared For

Intelsat License LLC
FILLMORE, CALIFORNIA
Temporary Transmit-Only Earth Station
Operation Dates: 01/30/2015 - 07/30/2015

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations. Verbal and written coordination was conducted with the below listed carriers on November 18, 2014.

Company

ABC Holding Company Inc.
AT&T California
AirSites2000, LLC
American Tower, LLC
Anaheim City, of
BNS Electronics, Inc.
BNSF Railway Company
Bishop Union High School
CCO SoCal I, LLC
CNG Communications, Inc.
California, State of
Calvary Chapel of Costa Mesa
Cellco Partnership - California
Chevron USA Inc.
City of Los Angeles Dept Water & Power
Coachella Valley Water District
Coast Community College District
Conterra Ultra Broadband, LLC
DRS Technical Services
Ducor Telephone Company
Entravision Holdings, LLC
Exxon Communications Company
Federal Communications Commission
Frazier Mountain Internet Service, Inc.
Freeport-McMoRan Oil & Gas LLC
Fresno MSA Limited Partnership
Fresno, County of
GTE Mobilnet of California LTD Partnersh
GTE Mobilnet of Santa Barbara LTD Ptnsh
Gila Electronics of Yuma, Inc
Glendale, City of

Company (Continued)

ION Media Los Angeles License, Inc.
KERN COMMUNITY COLLEGE DISTRICT BAKERSFI
KTLA, LLC
Kern County Superintendent of Schools
Kern Ed Telecom Consortium
Kern, County of
Kings County Office of Education
LDM Engineering
LOS ANGELES UNIFIED SCHOOL DISTRICT
Los Angeles City Info Technology Agency
Los Angeles County Dept of Public Works
Los Angeles County FCC Licensing Section
Los Angeles County Metro Transit Auth
Los Angeles SMSA Ltd. Partnership
MHO Networks
MOBILE RELAY ASSOCIATES INC
MONTEBELLO CITY CALIFORNIA
Metropolitan Water Dist of So California
NRJ TV LA License Co, LLC
New Cingular Wireless PCS - Los Angeles
New Cingular Wireless PCS LLC - N CAL
New Cingular Wireless PCS LLC -San Diego
Nextel of California Inc.
Nextweb Inc
Norris, Samuel O
Occidental of Elk Hills Inc.
Orange, County of, CA
Pacific Gas and Electric Company
Paramount Farming Company, LLC.
QUALCOMM INC.
Regents of the University of California
Regional 3Cs
Riverside, County of
San Bernardino County of California
San Diego Broadband
San Diego County Water Authority
San Diego Gas & Electric Company
San Diego, City of
San Diego, County of
San Luis Obispo, County of
Santa Barbara Cellular Systems, Ltd.
Santa Barbara, County of
Skyriver Communications
Southern California Edison Company
Southern California Gas Company
Southern California Regional Rail Auth.
Sprintcom, Inc
Station Venture Operations, LP
T-Mobile License LLC
TV MICROWAVES CO
Time Warner Cable Pacific West LLC
Tulare, County of
Turn Wireless, LLC

Company (Continued)

Ultimate Internet Access, Inc
Union Pacific Railroad Company
University of California, HPWREN
Ventura, County of
Verizon California Inc.
Verizon Wireless (VAW) LLC (Southern CA)
Verizon Wireless (VAW) LLC-N CA/NV
Vintage Production California LLC
WWC License L.L.C. - California
Western Technical Services
White, Fred K
unWired Broadband, Inc

There are no unresolved interference objections with the stations contained in these applications.

The following section presents the data pertinent to frequency coordination of the proposed earth station that was circulated to all carriers within its coordination contours.

COMSEARCH
Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 http://www.comsearch.com

Date:	12/14/2014
Job Number:	141118COMSJC01

Administrative Information

Status	TEMPORARY (Operation from 01/30/2015 to 07/30/2015)
Call Sign	TEMP07
Licensee Code	INTELS
Licensee Name	Intelsat License LLC

Site Information — FILLMORE, CALIFORNIA

Venue Name	
Latitude (NAD 83)	34° 24' 22.0" N
Longitude (NAD 83)	118° 53' 37.4" W
Climate Zone	A
Rain Zone	4
Ground Elevation (AMSL)	313.94 m / 1030.0 ft

Link Information

Satellite Type	Low Earth Orbit
Mode	TO - Transmit-Only
Modulation	Digital
Minimum Elevation Angle	5.0°
Azimuth Range	0.0° to 360°
Antenna Centerline (AGL)	8.23 m / 27.0 ft

Antenna Information — Transmit

Manufacturer		Scientific-Atlanta
Model		10.3 Meter
Gain / Diameter		53.8 dBi / 10.3 m
3-dB / 15-dB Beamwidth		0.40° / 0.60°
Max Available RF Power	(dBW/4 kHz)	10.9
	(dBW/MHz)	34.9
Maximum EIRP	(dBW/4 kHz)	64.7
	(dBW/MHz)	88.7
	(dBW)	88.0
Interference Objectives:	Long Term	-154.0 dBW/4 kHz 20%
	Short Term	-131.0 dBW/4 kHz 0.0025%

Frequency Information — Transmit 6.1 GHz

Emission / Frequency Range (MHz)	850KFXD / 6020.0
	850KFXD / 6025.0
	850KFXD / 6421.5
	850KFXD / 6423.5
Max Great Circle Coordination Distance	347.9 km / 216.2 mi
Precipitation Scatter Contour Radius	325.4 km / 202.2 mi

COMSEARCH
Earth Station Data Sheet
19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 http://www.comsearch.com

Coordination Values	**FILLMORE, CA**	
Licensee Name	Intelsat License LLC	
Latitude (NAD 83)	34° 24' 22.0" N	
Longitude (NAD 83)	118° 53' 37.4" W	
Ground Elevation (AMSL)	313.94 m / 1030.0 ft	
Antenna Centerline (AGL)	8.23 m / 27.0 ft	
Antenna Model	Scientific-Atlanta 10.3 Meter	
Antenna Mode	Transmit 6.1 GHz	
Interference Objectives: Long Term	-154.0 dBW/4 kHz	20%
Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	10.9 (dBW/4 kHz)	

Transmit 6.1 GHz

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
0	9.45	76.90	-10.00	256.40
5	9.81	73.28	-10.00	256.40
10	11.84	70.32	-10.00	256.40
15	10.91	66.54	-10.00	256.40
20	12.89	64.07	-10.00	256.40
25	13.83	61.45	-10.00	256.40
30	11.05	56.89	-10.00	256.40
35	11.05	53.97	-10.00	256.40
40	11.16	51.36	-10.00	256.40
45	12.08	49.66	-10.00	256.40
50	12.02	47.53	-10.00	256.40
55	12.02	45.80	-10.00	256.40
60	11.89	44.32	-10.00	256.40
65	10.13	41.66	-10.00	256.40
70	10.13	41.15	-10.00	256.40
75	10.13	41.13	-7.96	269.20
80	8.91	40.41	-4.20	292.90
85	8.91	41.41	0.77	324.20
90	6.32	40.56	4.53	347.90
95	6.32	42.59	4.53	347.90
100	6.32	45.00	4.53	347.90
105	6.35	47.76	4.53	347.90
110	5.84	50.44	4.53	347.90
115	4.00	52.69	4.53	347.90
120	2.01	55.33	4.53	347.90
125	1.94	59.11	4.53	347.90
130	2.44	63.20	4.53	347.90
135	2.62	67.23	4.53	347.90
140	2.67	71.27	4.53	347.90
145	2.87	75.38	4.53	347.90
150	2.62	79.46	4.53	347.90
155	3.19	83.65	4.53	347.90
160	2.85	87.77	4.53	347.90
165	3.52	91.91	4.53	347.90
170	3.28	96.04	4.53	347.90
175	3.00	100.19	4.53	347.90
180	2.53	104.38	4.53	347.90

COMSEARCH
Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
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Coordination Values	**FILLMORE, CA**	
Licensee Name	Intelsat License LLC	
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Antenna Centerline (AGL)	8.23 m / 27.0 ft	
Antenna Model	Scientific-Atlanta 10.3 Meter	
Antenna Mode	Transmit 6.1 GHz	
Interference Objectives: Long Term	-154.0 dBW/4 kHz	20%
Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	10.9 (dBW/4 kHz)	

Transmit 6.1 GHz

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
185	2.35	108.51	4.53	347.90
190	2.28	112.57	4.53	347.90
195	0.78	117.05	4.53	347.90
200	0.41	121.18	4.53	347.90
205	1.23	124.74	4.53	347.90
210	0.97	128.61	4.53	347.90
215	0.94	132.22	4.53	347.90
220	0.00	136.21	4.53	347.90
225	0.00	139.42	4.53	347.90
230	0.00	142.31	4.53	347.90
235	0.00	144.80	4.53	347.90
240	0.00	146.79	4.53	347.90
245	0.00	148.21	4.53	347.90
250	0.00	148.95	4.53	347.90
255	0.00	148.97	4.53	347.90
260	0.00	148.28	4.53	347.90
265	0.00	146.92	4.53	347.90
270	0.00	144.96	4.53	347.90
275	1.12	141.62	0.77	324.20
280	1.30	138.71	-4.20	292.90
285	2.93	134.56	-7.96	269.20
290	4.19	130.57	-10.00	256.40
295	4.04	127.29	-10.00	256.40
300	4.42	123.56	-10.00	256.40
305	3.72	120.18	-10.00	256.40
310	3.09	116.58	-10.00	256.40
315	2.76	112.74	-10.00	256.40
320	3.33	108.58	-10.00	256.40
325	4.75	104.28	-10.00	256.40
330	5.93	100.12	-10.00	256.40
335	7.78	95.99	-10.00	256.40
340	8.25	92.08	-10.00	256.40
345	9.31	88.23	-10.00	256.40
350	9.65	84.45	-10.00	256.40
355	9.64	80.68	-10.00	256.40

Certification

I hereby certify that I am the technically qualified person responsible for the preparation of the frequency coordination data contained in this report. I am familiar with Parts 101 and 25 of the FCC Rules and Regulations and I have either prepared or reviewed the frequency coordination data submitted with this report, and that it is complete and correct to the best of my knowledge and belief.

Jeffrey E. Cowles

Jeffrey E. Cowles
Engineer III, Telecommunications
COMSEARCH
19700 Janelia Farm Blvd.
Ashburn, Va. 20147

DATED: December 14, 2014

INTELSAT
Envision. Connect. Transform.

December 17, 2014

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

Re: Request for Special Temporary Authority
Fillmore, California Earth Station E4132

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")[1] for 180 days, commencing February 1, 2015, to use its Fillmore, California C-band earth station—call sign E4132—to provide launch and early orbit phase ("LEOP") services for the Eutelsat-115WB satellite. Eutelsat-115WB is expected to be launched no earlier than February 1, 2015.[2] The LEOP period is expected to last approximately 196 days.[3]

The Eutelsat-115WB LEOP operations will be performed in the following frequency bands: 6423.5 MHz and 6421.5 MHz in the uplink (LHCP), and 4199.0 MHz and 4199.8 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.[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 Eutelsat-115WB 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.

---

[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 Eutelsat-115WB, which Intelsat understands is licensed by Mexico, will be at 114.9° W.L. The in-orbit testing location will be 114.9° E.L.

[3] Intelsat is seeking authority for 180 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite.

[4] Intelsat will handle the coordination.

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 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 Eutelsat-115WB 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 34.2 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 Eutelsat-115WB LEOP mission, Boeing will control the spacecraft. Boeing 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 Boeing. Intelsat will perform the ranging sessions by sending a tone to the spacecraft periodically. 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 Eutelsat-115WB satellite. This, in turn, will help ensure continuity of service at the 114.9° W.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. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais