

January 26, 2015

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 March 1, 2015, 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”) 1D satellite.² IRNSS-1D is expected to be launched no earlier than March 1, 2015.³ The LEOP period is expected to last approximately 10 days.⁴

The IRNSS-1D LEOP operations will be performed in the following frequency bands: 5850.982 MHz and 5853.028 MHz in the uplink (R/LCP), and 4199.508 MHz and 4199.760 MHz in the downlink (R/LCP). For the IRNSS-1D satellite LEOP mission the max EIRP/carrier is 87 dBW; max EIPR density/carrier is 27.7 dBW; emission data is 850 kHz FM; antenna data/gain is 54.8 dBI; and input power at the antenna flange is 32.6 dBW.

The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁵ 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.

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 Intelsat previously filed for, and was granted, an identical STA for December 31, 2014-January 30, 2015. Because of a lengthy launch delay, Intelsat will be allowing that STA to expire. *See Satellite Communications Services Information; Actions Taken*, Report No. SES-01713, File No. SES-STA-20141208-00889 (Dec. 31, 2014) (Public Notice).

³ The permanent orbital location for IRNSS-1D, which Intelsat understands is licensed by India, will be at 111.75° E.L. The in-orbit testing location will be 111.75° E.L.

⁴ Intelsat is seeking authority for 30 days to accommodate a possible launch delay.

⁵ Indian Space Research Organization, the manager of the IRNSS-1D LEOP mission, will handle the coordination.

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The 24x7 contact information for the IRNSS-1D 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, as Exhibit A, a waiver request. Intelsat also notes that for purposes of the IRNSS-1D LEOP mission, it is seeking to operate in the frequencies listed in the request at power levels not to exceed 33 dBW. 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-1D launch, the Indian Space Research Organization (“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-1D satellite. This, in turn, will help provide navigation services to India and neighboring areas from the 111.75° 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. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais