

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 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 7900 Tysons One Place	E-Mail:	susan.crandall@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
Attention:	Susan H. Crandall		

30 days "With Conditions"



File# SES-STA-20150303-00107

Call Sign E4132 Grant Date 03/03/2015  
(or other identifier)

Term Dates  
From 03/03/2015 To: 04/01/2015

Approved: Mel E. Hester


Applicant: Intelsat License LLC  
File No.: SES-STA-20150303-00107  
Call Sign: E4132

Intelsat License LLC is granted special temporary authority, for 30 days, from March 3, 2015, to operate its earth station, Call Sign E4132, located in, Fillmore, California, to provide launch and early orbit phase services for the ABS-3 satellite, licensed and registered by Papua New Guinea, as it travels to its permanent orbital location 3.0° W.L. Communications will be on the following center frequencies: 6420 MHz and 6425 MHz (LHCP) in the (Earth-to-space) and 4194.5 MHz and 4197.0 MHz (LHCP) in the (space-to-Earth) and under the following conditions:

1. Intelsat License LLC will coordinate with operators of co-frequency satellites in the drift path.
2. Operations in the uplink frequencies will be within the coordinated parameters of the antenna's current license.
3. Operations, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference.
4. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future Intelsat License LLC's applications.
5. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat License LLC's risk.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective immediately.

*30 days* *"With conditions"*

 <b>GRANTED</b> International Bureau	<b>File#</b> <u>SES-STA-20150303-00107</u>
	<b>Call Sign</b> <u>E4132</u> <b>Grant Date</b> <u>03/03/2015</u> (or other identifier)
	<b>Term Dates</b> <b>From</b> <u>03/03/2015</u> <b>To</b> <u>04/01/2015</u>
	<b>Approved:</b> <u>Paul E. Han</u>

<b>2. Contact</b>	
<b>Name:</b>	Susan H. Crandall
<b>Company:</b>	Intelsat Corporation
<b>Street:</b>	7900 Tysons One Place
<b>Phone Number:</b>	703-559-7848
<b>Fax Number:</b>	703-559-8539
<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	McLean
<b>State:</b>	VA
<b>Country:</b>	USA
<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>	
<b>Relationship:</b>	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?	
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).	
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee	
<input type="radio"/> Other (please explain):	
4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station	
5. Type Request	
<input type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other	
6. Requested Use Prior Date	
7. City Fillmore	
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: 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, commencing immediately, to use its Fillmore, California C-band earth station, call sign E4132, to provide launch and early orbit phase services for the ABS-3A satellite.	
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 <input checked="" type="radio"/> No <input type="radio"/>	
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**

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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.**

March 2, 2015

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Request for Special Temporary Authority  
Fillmore, California Earth Station E4132  
**EXPEDITED TREATMENT REQUESTED**

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, commencing immediately, to use its Fillmore, California C-band earth station—call sign E4132—to provide launch and early orbit phase (“LEOP”) services for the ABS-3A satellite. This request for STA is related to a verbal grant provided by the Federal Communications Commission (“FCC”) on March 2, 2015. ABS-3A was successfully launched March 1, 2015.<sup>2</sup> The LEOP period is expected to last approximately 160 days,<sup>3</sup> and the ABS-3A LEOP operations will be performed in the following frequency bands: 6420.00 MHz and 6425.00 MHz in the uplink (LHCP), and 4194.5 MHz and 4197.0 MHz in the downlink (LHCP).

As Intelsat has previously informed the International Bureau staff on March 2, 2015, upon launch Intelsat discovered the ABS-3A satellite frequencies provided by its customer, which are reflected in Intelsat’s December 16, 2014 STA request,<sup>4</sup> were incorrect. The original STA request specified use of 6020.00 MHz and 6025.0 MHz in the uplink (LHCP)—the correct uplink frequencies are 6420.00 MHz and 6425.0 MHz (LHCP).

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<sup>1</sup> 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”).

<sup>2</sup> The permanent orbital location for ABS-3A, which Intelsat understands is licensed by Papua New Guinea, will be at 3° W.L. The in-orbit testing location will be 3° W.L.

<sup>3</sup> Intelsat will also be seeking authority for 180 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite.

<sup>4</sup> See *Satellite Communications Services Information; Actions Taken*, Report No. SES-01723, File No. SES-STA-20141217-00904 (Feb. 4, 2015) (Public Notice). Intelsat will not be operating under this grant of authority.

Intelsat requests that the STA sought herein commence immediately. The frequency error was unforeseen, as the incorrect frequencies were provided in error by the party contracting with Intelsat for LEOP services. As such this is the type of extraordinary event that makes grant of an STA on less than three working days' advance notice appropriate.<sup>5</sup>

To the extent necessary, Intelsat also requests a waiver of 47 C.F.R. § 25.120(a), which requires an STA request to "contain the full particulars of the proposed operation including all the facts sufficient to justify the temporary authority sought." The Commission may grant a waiver for good cause shown.<sup>6</sup> 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.<sup>7</sup> 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 to waive 47 C.F.R. § 25.120(a) because the unforeseen error in uplink frequencies was not, and could not have been, discovered by Intelsat until after the launch of the ABS-3A satellite and therefore it is not possible for Intelsat to obtain a coordination report to submit contemporaneously with this request. Intelsat will take all practical steps to coordinate the safe operation of E4132. 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. Grant of this STA request will allow Intelsat to perform TT&C for the ABS-3A satellite and therefore safely transition the satellite to geostationary orbit. As such, this request is in the public interest.

Intelsat will, as soon as possible, provide technical information demonstrating 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. Intelsat has commenced coordination based on the correct frequencies.

In further support of this request, Intelsat hereby attaches Exhibit A, a waiver request of 47 C.F.R. § 25.137 and § 25.114, which was also part of its original STA request.<sup>8</sup>

During the ABS-3A LEOP mission, Boeing will serve as the mission manager. 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.

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<sup>5</sup> See 47 C.F.R. 25.120(a).

<sup>6</sup> 47 C.F.R. §1.3.

<sup>7</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

<sup>8</sup> See *supra* note 4.

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Ms. Marlene H. Dortch  
March 2, 2015  
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For these reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request.

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 large initial 'C'.

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais