

March 6, 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 E000363  
**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 March 13, 2015, to use its Fillmore, California C-band earth station—call sign E000363—to provide launch and early orbit phase (“LEOP”) services for the ABS-3A satellite. ABS-3A was successfully launched March 1, 2015.<sup>2</sup> The LEOP period is expected to last approximately 240 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 February 3, 2015 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 is seeking authority for 180 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite. *See Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-01724, File No. SES-STA-20150203-00051 (Feb. 11, 2015) (Public Notice).

<sup>4</sup> *See Satellite Communications Services Information; Actions Taken*, Report No. SES-01725, File No. SES-STA-20150203-00050 (Feb. 11, 2015) (Public Notice). Intelsat will not be operating under this grant of authority.

Ms. Marlene H. Dortch  
March 6, 2015  
Page 2

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 BAS-3A 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 26.2 dBW because Intelsat might operate at this level in the event an emergency necessitates the use of a higher power 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 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.

Grant of this STA request will allow Intelsat to help launch the ABS-3A satellite. This, in turn will result in the provision of VSAT, TV distribution, IP trunking, cellular backhaul, and maritime services from the 3° W.L. orbital location and thereby promotes the public interest.

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,



Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais