

March 13, 2015

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

Re: Request for Further Extension of Special Temporary Authority
Hagerstown, Maryland Earth Station KA258

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days—from March 16, 2015 through May 14, 2015—of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to use its Hagerstown, Maryland Ku-band earth station—call sign KA258—to continue providing telemetry, tracking, and control (“TT&C”) services to Intelsat 30 at its permanent location of 95.05° W.L.² Intelsat has filed an application for a permanent modification to KA258 for TT&C operations at 95.05° W.L.³

Intelsat 30 arrived on-station at 95.05° W.L. on November 19, 2014. The satellite’s TT&C operations will continue to be performed using the following frequencies: 13750.50 MHz and 14003.50 MHz in the uplink (LHCP), and 11198.00 MHz, 11198.50 MHz, 11199.25 MHz, and 11199.75 MHz in the downlink (RHCP).

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”). Due to an inadvertent miscalculation of the dates, although Intelsat is filing this extension request prior to the existing STA’s expiration, Intelsat is unable to file at least three working days prior to expiration. Accordingly, Intelsat respectfully requests a waiver of the three working day requirement set forth in Section 25.120(a). Given that this STA is for TT&C services, waiver is warranted to ensure safe station-keeping of the satellite.

² See *Satellite Communications Services Information; Actions Taken*, Report No. SES-01718, File No. SES-STA-20141217-00903 (Jan. 21, 2015) (Public Notice); *Satellite Communications Services Information; Actions Taken*, Report No. SES-01703, File No. SES-STA-20141112-00855 (Nov. 26, 2014) (Public Notice); *Satellite Communications Services Information; Actions Taken*, Report No. SES-01691, File No. SES-STA-20140917-00735 (Oct. 15, 2014) (Public Notice). The original STA included launch and early orbit phase (“LEOP”) services, TT&C services at Intelsat 30’s in-orbit testing (“IOT”) location, TT&C services during the drift of the spacecraft from its 132.0° W.L. IOT location to its final location at 95.05° W.L., and TT&C services on-station at 95.05° W.L. Because Intelsat 30 is now on-station at 95.05° W.L., Intelsat is only seeking further extension of STA for TT&C services at 95.05° W.L.

³ See *Intelsat License LLC Request for Modification of Earth Station License KA258*, File No. SES-MFS-20141212-00891.

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To the extent required, Intelsat will continue to coordinate with all operators of satellites that are potentially affected by these operations at the 95.05° W.L. location.⁴ All operators of potentially affected satellites 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 Intelsat 30 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 further extension request, Intelsat incorporates by reference the Exhibit A submitted with its original STA request, which contains 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. 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. Intelsat also notes that for purposes of the Intelsat 30 mission, it is seeking to operate in the frequencies listed in this request at power levels not to exceed 22.9 dBW.

Grant of this STA further extension request will allow Intelsat to continue with the provision of TT&C services to the Intelsat 30 satellite at 95.05° W.L., which ensures safe station-keeping of the satellite. This, in turn, will help ensure continuity of service at the 95.05° W.L. orbital location and thereby promotes the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-8539.

Respectfully submitted,



Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais

⁴ Intelsat will continue to handle the coordination.