IB2015000503

3060-0678 Approved by OMB

# APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATIONEnter a description of this application to identify it on the main menu: Request for 30-Day STA for Hagerstown, Maryland Earth Station KA275

1				
1. Applicant	it.		68	27
<b>F</b>	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		



Applicant:

Intelsat License LLC

File No.:

SES-STA-20150316-00159

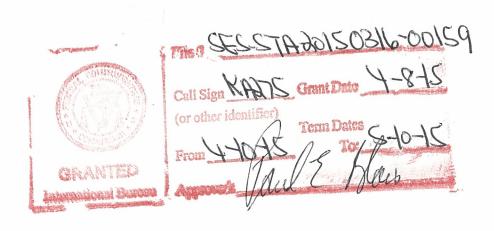
Call Sign:

KA275

Intelsat License LLC is granted special temporary authority, for 30 days, from April 10, 2015, to operate its earth station, Call Sign KA275, located in, Hagerstown, Maryland, 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.



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:		Relationship:	Legal Counsel
(If your application is related to an application. Please enter only one.) 3. Reference File Number or Sub	If your application is related to an application filed with tapplication. Please enter only one.)  3. Reference File Number or Submission ID	he Commission, enter either t	(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 submitte  If Yes, complete ar	4a. Is a fee submitted with this application?  If Yes, complete and attach FCC Form 159. If No, in	ndicate reason for fee exempti	If No, indicate reason for fee exemption (see 47 C.F.R.Section 1.1114).
O Governmental Enti	O Governmental Entity O Noncommercial educational licensee	al licensee	
Other(please explain):	in):		
4b. Fee Classification	CGX - Fixed Satellite Transmit/Receive Earth Station	eceive Earth Station	
5. Type Request			
Use Prior to Grant		O Change Station Location	• Other
6. Requested Use Prior Date	Date		
7. CityHagerstown		8. Latitude (dd mm ss.s h)	39 35 54.0 N

9. State MD	10. Longitude (dd mm ss.s.h) 77 45 33.0 W
11. Please supply any need attachments.	
Attachment 1: STA Request Attachment 2: Exhibit A	A Attachment 3: Exhibit B
12. Description. (If the complete description does not appear in this b	(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 upon grant but no later than April 10, 2015, to use its Hagerstown, Maryland	erein requests a grant of Special Temporary Authority for 30 days, but no later than April 10, 2015, to use its Hagerstown, Maryland C-
band earth station, call sign KA275, to provide launch and early orbit phase services for the ABS-3A satellite. ABS-3A was successfully launched on March 1, 2015.	.l sign KA275, to provide launch and early orbit phase services for ABS-3A was successfully launched on March 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	any other party to the application is    The section 5301 of the Anti-Drug Act    The section 5501 of the Anti-Drug Act
See 47 CFR 1.2002(b) for the meaning of " party to the application" for these purposes.	or distribution of a controlled substance.  Acquot; for these purposes.
14. Name of Person Signing Cynthia J. Grady	15. Title of Person Signing Regulatory Counsel, Intelsat Corporation
WILLFUL FALSE STATEMENTS MADE ON THIS FORM (U.S. Code, Title 18, Section 1001), AND/OR REV (U.S. Code, Title 47, Section 312(a)(1)), AND/OF	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 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 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 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. 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.<sup>2</sup>

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.<sup>3</sup> The Commission may grant a waiver for good cause shown.<sup>4</sup> The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.<sup>5</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>6</sup> 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 ABS-3A 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 ABS-3A satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with Boeing, the manufacturer of the ABS-3A satellite, to conduct LEOP services for the satellite.

<sup>&</sup>lt;sup>1</sup> 47 C.F.R. § 25.137 (emphasis added).

<sup>&</sup>lt;sup>2</sup> 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").

<sup>&</sup>lt;sup>3</sup> 47 C.F.R. §§ 25.137 and 25.114.

<sup>&</sup>lt;sup>4</sup> 47 C.F.R. §1.3.

<sup>&</sup>lt;sup>5</sup> N.E. Cellular Tel. Co. v. FCC, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("Northeast Cellular").

<sup>&</sup>lt;sup>6</sup> 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 ABS-3A 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. 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 use its earth station to provide temporary and intermittent LEOP services to the ABS-3A satellite.

It is Intelsat's understanding that ABS-3A is licensed by Papua New Guinea, 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.

<sup>&</sup>lt;sup>7</sup> 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 Hagerstown, Maryland

Temporary Transmit-Only Earth Station Operation Dates: 03/05/2015 - 09/05/2015

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 March 3, 2015.

### Company

256Q Networks AB Services LLC AT&T COMMUNICATIONS OF MARYLAND INC AT&T Communications of Virginia, LLC AT&T Corporation **AWC Networks** Adams County Department of Emergency Svc Affiniti PA, LLC Alltel Communications LLC - Ohio Region Alltel Communications LLC - Western PA Alltel Communications LLC-E OH WV Alltel Communications LLC-Southern VA Alltel Communications LLC-TriState Rgn Alltel Communications of Petersburg Inc American Electric Power Service Co Appalachia Engineering Services Appalachian Broadcasting Atlantic Broadband (Penn), LLC Atlantic City Electric Company Atlantic, County of Auburn Data Systems, LLC Augusta, County of B<sub>20</sub> LLC BAY BROADBAND COMMUNICATIONS LLC **BLAIR COUNTY 911** Baltimore County of Maryland Baltimore Gas and Electric Company Beaver Springs Faith Baptist Church, Inc. Bedford, County of

Believe Wireless, LLC

Berks County Department of Emergency Ser

Blue Ridge Carriers

Blueline Communications

CLEARFIELD, COUNTY OF

**CNG Transmission Corporation** 

CROWN COMMUNICATION, INC.

Cambria, County of

Capital Communications of America

Carroll, County of

Cellco Partnership - Bridgeville, PAWV

Cellco Partnership - Southern Virginia

Cellco Partnership- PA Region

Cellco Partnership-WDC/Baltimore

Cellco Prtnrshp - Phil. Tri-State Rgn

Centre, County of

Charles, County of

Chester, County of

Chester. County of

China Cat Productions LLC

Citynet

Clinton, County of

Columbia Gas Transmission Corporation

Commonwealth of Pennsylvania

Commonwealth of Pennsylvania-Radio Proj.

Comprehensive Wireless LLC

Conterra Ultra Broadband, LLC

Converge Towers LLC

Coral Reef Technologies Ltd

Coralinks

County of Camden

County of Fayette

County of Frederick

County of Lycoming

County of York

DAUPHIN COUNTY EMERGENCY MANAGEMENT

Delaware County (PA) Emergency Services

**Delaware Division of Communications** 

Delmarva Power and Light Company

ECW Wireless, LLC

EG Broadcast Newco Corp

Eastern MLG LLC

Electric Railroad, LLC

Enoch Pratt Free Library

Exelon Generation Company, LLC

FELHC, INC

Federal Communications Commission

Frederick County

Fundamental Broadcasting LLC

**Garden State Transmissions** 

Geodesic Networks LLC

Gloucester, County of

Greene, County of (PA)

Hanover, County of

Hardy Cellular Telephone Company

Harrisonburg-Rockingham ECC

High Voltage Communications LLC

Huntingdon, County of

Indiana, County of

JEFFERSON COUNTY OF PENNSYLVANIA

Jefferson Microwave, LLC

Juniata County Emergency Services

Kentucky Power Company

King and Queen County

Kryptick Technologies

Lancaster County-Wide Communications

Limitless Mobile, LLC

Loudoun, County of

MGW Networks, LLC

MVC Research. LLC

Maryland Public Broadcasting Commission

Maryland State Highway Administration

Maryland, State of - Dept. of Info & Tech

Mifflin Mobilecom

Montgomery County Of

Motorola Solutions, Inc.

National Tower Company LLC

New Cingular Wireless PCS LLC -NJ

New Cingular Wireless PCS - Maryland

New Cingular Wireless PCS LLC - DC

New Cingular Wireless PCS LLC - Ohio New Cingular Wireless PCS LLC - VA

New Cingular Wireless PCS LLC - VA

New Cingular Wireless PCS LLC-DE/NH/RI

New Cingular Wireless PCS, LLC - PA

New Jersey Turnpike Authority-Pkwy Div

New Jersey, State of -NJ Transit

Norfolk Southern Railway

Northumberland, County of

OHIO VALLEY ELECTRIC COMPANY

Old Dominion LLC

PA Communications

PEG Bandwidth, LLC

**PSEG Services Corporation** 

Peco Energy Company

Penn Service Microwave Co., Inc.

Pennsylvania Turnpike Commission

Peoples Natural Gas Company LLC

Pitt Power

Pittsburgh SMSA Limited Partnership

Prince George's County

Prince William, County of

RAPPAHANNOCK ELECTRIC COOPERATIVE

Radio One Inc

Rendezvous Communications LLC

Rural Broadband Network Services LLC

SCS Networks

SCTF NET

SHENANDOAH VALLEY ELECTRIC COOPERATIVE

SOMERSET COUNTY

SW Networks

Southern Maryland Electric Cooperative I

Spotsylvania, County of

St. Mary's County of (MD)

Stafford, County of

Standard Backhaul Communications LLC

State of Maryland, MIEMSS

Texas Eastern Communications, LLC

Thought Transmissions, LLC

Torellco LLC

Turtle Networks 6562

Turtle Networks 6569

US Cellular Operating Company, LLC (WI)

USCOC of Cumberland, Inc.

USCOC of Virginia RSA #3, Inc.

USOC of Pennsylvania RSA No 10 B2 Inc.

Velox Networks LLC

Verizon Maryland, Inc.

Verizon Wireless (VAW) LLC - Delaware/NJ

Verizon Wireless (VAW) LLC - Maryland

Verizon Wireless (VAW) LLC - W/B/V Mkts

Verizon Wireless (VAW) LLC-Pennsylvania

Verizon Wireless VAW LLC - West Virginia

Verizon Wireless VAW LLC-Southern VA

Virginia RSA 5 Limited Partnership

Virginia Broadband, LLC

Virginia Cellular LLC

Virginia Department of State Police

Virginia Electric & Power Company

Virginia PCS Alliance, L.C.

WHEELING POWER COMPANY

WITF Inc.

WV DHHR BPH, Office of EMS, Com. Div.

Washington D.C. SMSA L.P.

Washington Gas Light Company

Washington Suburban Sanitary Commission

Webline Holdings LLC Wireless Internetwork LLC World Class Wireless, LLC YAB Mobile iSignal

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:

03/04/2015

Job Number:

150303COMSJC04

**Administrative Information** 

Status TEMPORARY (Operation from 03/05/2015 to 09/05/2015)

Call Sign TEMP09 Licensee Code **INTELS** 

Licensee Name Intelsat License LLC

**Site Information** HAGERSTOWN, MARYLAND

Venue Name

39° 35' 54.7" N Latitude (NAD 83) 77° 45' 35.3" W Longitude (NAD 83)

Climate Zone Rain Zone

171.3 m / 562.0 ft Ground Elevation (AMSL)

**Link Information** 

Satellite Type Geostationary Mode TO - Transmit-Only Modulation Analog and Digital

Satellite Arc 6° W to 149° West Longitude

Azimuth Range 101.9° to 257.8° Corresponding Elevation Angles 5.3° / 5.7°

Antenna Centerline (AGL) 12.5 m / 41.0 ft

**Antenna Information Transmit** Manufacturer TIW

Model 19.0 Meter 59.1 dBi / 19.0 m Gain / Diameter 0.20° / 0.40° 3-dB / 15-dB Beamwidth

Max Available RF Power (dBW/4 kHz) 5.6

(dBW/MHz) 29.6

Maximum EIRP (dBW/4 kHz) 64.7 (dBW/MHz) 88.7 (dBW) 0.88

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 / 6420.0 850KFXD / 6425.0

Max Great Circle Coordination Distance

552.8 km / 343.4 mi 369.4 km / 229.5 mi

Precipitation Scatter Contour Radius

### **COMSEARCH**

### **Earth Station Data Sheet**

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

**Coordination Values** 

HAGERSTOWN, MD

Licensee Name Latitude (NAD 83) Longitude (NAD 83) Ground Elevation (AMSL) Antenna Centerline (AGL)

Intelsat License LLC 39° 35' 54.7" N 77° 45' 35.3" W 171.3 m / 562.0 ft 12.5 m / 41.0 ft TIW 19.0 Meter

Antenna Model Antenna Mode

Transmit 6.1 GHz

Interference Objectives: Long Term

-154.0 dBW/4 kHz

Short Term

20% -131.0 dBW/4 kHz 0.0025%

Max Available RF Power

5.6 (dBW/4 kHz)

Transmit	6.1	GHz
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			Halloli	III O. I Griz	
	Horizon	Antenna	Horizon	Coordination	
Azimuth (°)	Elevation (°)	Discrimination (°)	Gain (dBi)	Distance (km)	
0	0.00	101.81	-10.00	202.62	
5	0.00	96.84	-10.00	202.62	
10	0.00	91.86	-10.00	202.62	
15	0.00	86.88	-10.00	202.62	
20	0.00	81.90	-10.00	202.62	
25	0.00	76.92	-10.00	202.62	
30	0.00	71.95	-10.00	202.62	
35	0.00	66.97	-10.00	202.62	
40	0.00	62.00	-10.00	202.62	
45	0.00	57.03	-10.00	202.62	
50	0.00	52.06	-10.00	202.62	
55	0.00	47.09	-9.82	203.29	
60	0.00	42.14	-8.62	206.27	
65	0.00	37.19	-7.26	211.60	
70	0.00	32.26	-5.72	217.96	
75	0.00	27.34	-3.92	225.69	
80	0.00	22.47	-1.79	235.39	
85	0.00	17.65	0.83	248.04	
90	0.00	12.98	4.17	265.01	
95	0.00	8.66	8.56	291.02	
100	0.00	5.61	13.27	552.79	
105	0.00	6.15	12.28	385.58	
110	0.00	9.60	7.45	284.12	
115	0.00	13.27	3.93	263.67	
120	0.00	16.89	1.31	249.82	
125	0.00	20.41	-0.75	240.32	
130	0.00	23.83	-2.43	232.43	
135	0.00	27.11	-3.83	226.10	
140	0.00	30.23	-5.01	220.95	
145	0.00	33.14	-6.01	216.73	
150	0.00	35.82	-6.85	213.26	
155	0.00	38.20	-7.55	210.44	
160	0.00	40.26	-8.12	208.19	
165	0.00	41.93	-8.56	206.48	
170	0.00	43.16	-8.88	205.27	
175	0.00	43.92	-9.07	204.55	
180	0.00	44.18	-9.13	205.93	

### COMSEARCH

### **Earth Station Data Sheet**

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

**Coordination Values** 

Licensee Name Latitude (NAD 83)

Longitude (NAD 83)

Ground Elevation (AMSL) Antenna Centerline (AGL) Antenna Model

Antenna Mode

Interference Objectives: Long Term

Short Term

Transmit 6.1 GHz

HAGERSTOWN, MD

Intelsat License LLC 39° 35' 54.7" N 77° 45' 35.3" W

171.3 m / 562.0 ft 12.5 m / 41.0 ft TIW 19.0 Meter

> -154.0 dBW/4 kHz 20% -131.0 dBW/4 kHz 0.0025%

Max Available RF Power 5.6 (dBW/4 kHz)

Transmit 6.1 GHz

	Horizon	Antenna	Horizon	Coordination
Azimuth (°)	Elevation (°)	Discrimination (°)	Gain (dBi)	Distance (km)
185	0.00	43.92	-9.07	204.54
190	0.00	43.16	-8.88	205.27
195	0.00	41.93	-8.56	206.48
200	0.00	40.26	-8.12	208.19
205	0.00	38.20	<i>-</i> 7.55	210.44
210	0.00	35.81	-6.85	213.26
215	0.00	33.14	-6.01	216.73
220	0.00	30.22	-5.01	220.96
225	0.00	27.11	-3.83	226.10
230	0.00	23.83	-2.43	232.42
235	0.00	20.42	-0.75	240.31
240	0.00	16.89	1.31	249.84
245	0.00	13.28	3.92	263.65
250	0.00	9.59	7.46	284.19
255	0.00	6.33	11.96	396.43
260	0.00	6.11	12.35	531.75
265	0.00	9.18	7.93	287.06
270	0.00	13.46	3.77	262.82
275	0.00	18.11	0.55	246.67
280	0.00	22.90	-2.00	234.42
285	0.00	27.76	-4.09	224.96
290	0.00	32.66	-5.85	217.39
295	0.00	37.59	-7.38	211.14
300	0.00	42.53	-8.72	205.88
305	0.00	47.48	-9.91	202.95
310	0.00	52.44	-10.00	202.62
315	0.00	57.40	-10.00	202.62
320	0.00	62.37	-10.00	202.62
325	0.00	67.34	-10.00	202.62
330	0.00	72.31	-10.00	202.62
335	0.00	77.28	-10.00	202.62
340	0.00	82.26	-10.00	202.62
345	0.00	87.23	-10.00	202.62
350	0.00	92.21	-10.00	202.62
355	0.00	97.18	-10.00	202.62

### 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, Virginia 20147

DATED: March 4, 2015



March 16, 2015

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

Re: Request for Special Temporary Authority

Hagerstown, Maryland Earth Station KA275

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA") for 30 days, commencing upon grant but no later than April 10, 2014, to use its Hagerstown, Maryland C-band earth station—call sign KA275—to provide launch and early orbit phase ("LEOP") services for the ABS-3A satellite. The ABS-3A satellite was successfully launched on March 1, 2015. The LEOP period is expected to last approximately 240 days.

The ABS-3A LEOP operations will be performed in the following frequency bands: 6420.00 MHz and 6425.0 MHz in the uplink (LHCP), and 4194.5 MHz and 4197.0 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.<sup>4</sup> 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 ABS-3A 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 Exhibits A and B, which contain technical information that demonstrates that the operation of the earth station will be compatible with its

<sup>&</sup>lt;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>&</sup>lt;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>&</sup>lt;sup>3</sup> Intelsat is concurrently seeking authority for 180 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite.

<sup>&</sup>lt;sup>4</sup> Intelsat will handle the coordination.

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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 ABS-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 34.0 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 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.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

Cynthia J. Hady

Cynthia J. Grady Regulatory Counsel

Intelsat Corporation

cc: Paul Blais