

March 13, 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”)<sup>1</sup> for 180 days, commencing upon grant, to use its Riverside, California C-band earth station—call sign E040125—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.<sup>2</sup> The LEOP period is expected to last approximately 240 days.<sup>3</sup>

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

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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.

<sup>4</sup> Intelsat will handle the coordination.

Ms. Marlene H. Dortch  
March 13, 2015  
Page 2

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,

A handwritten signature in blue ink that reads "Cynthia J. Grady". The signature is written in a cursive, flowing style.

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais