

March 25, 2015

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

Re: Request for Extension of Special Temporary Authority  
Fillmore, California Earth Station E4132

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a thirty-day extension—through May 1, 2015—of the Special Temporary Authority (“STA”) <sup>1</sup> previously granted Intelsat 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.<sup>2</sup> ABS-3A was successfully launched March 1, 2015.<sup>3</sup> The LEOP period is expected to last approximately 240 days,<sup>4</sup> and the ABS-3A LEOP operations will continue to 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).

In further support of this extension request, Intelsat incorporates by reference Exhibit A which contains a waiver request submitted with its original STA request and the technical information provided in a supplement dated March 6, 2015.<sup>5</sup> The provided technical information 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

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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> See *Satellite Communications Services Information; Actions Taken*, Report No. SES-01731, File No. SES-STA-20150303-00107 (Mar. 11, 2015) (Public Notice).

<sup>3</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>4</sup> Intelsat is also 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., File No. SES-STA-20150303-00108 (Mar. 11, 2015) (Public Notice).

<sup>5</sup> See Letter from Cynthia J. Grady, Counsel for Intelsat License LLC, to Ms. Marlene H. Dortch, FCC, File Nos. SES-STA-20150303-00107& SES-STA-20150303-00108 (Mar. 6, 2015).

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interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

During the ABS-3A LEOP mission, Boeing will continue to 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 continue to 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 grant this extension 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, flowing style.

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais