

April 8, 2015

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

Re: Request for Extension of Special Temporary Authority

Fillmore, California Earth Station E000363

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days—from April 12, 2015 through May 11, 2015—of the Special Temporary Authority ("STA")¹ previously granted Intelsat 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.² ABS-3A was successfully launched March 1, 2015.³ The LEOP period is expected to last approximately 240 days.⁴

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).

The LEOP operations will continue to be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁵ 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:

¹ Intelsat has filed this STA request, an FCC Form 159, and a \$195.00 filing fee electronically via the International Bureau's Filing System.

² See Satellite Communications Services Information; Actions Taken, Report No. SES-01731, File No. SES-STA-20150306-00116 (Mar. 11, 2015) (Public Notice).

³ 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.

⁴ 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. SES-01738, File No. SES-STA-20150203-00051 (Apr. 8, 2015) (Public Notice).

⁵ Intelsat will handle the coordination.

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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 extension request, Intelsat incorporates by reference Exhibits A and B submitted with its original, March 6, 2015, STA request, which contains technical information and a waiver request. During the ABS-3A LEOP mission, Intelsat will continue to operate in the frequencies listed in its original request at power levels not to exceed 25.5 dBW. The technical information submitted with Intelsat's original 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.

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 continue to process and execute the commands. Telemetry received by Intelsat will continue to 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 extension request will allow Intelsat to continue aiding in the launch of 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 extension request.

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