

May 5, 2015

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

Re: Request for Extension of Special Temporary Authority
Riverside, California Earth Station E040125

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days—from May 10, 2015 through June 8, 2015—of the Special Temporary Authority (“STA”)¹ originally granted to Intelsat 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.² The ABS-3A satellite was successfully launched on 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 6425.0 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:

Ph.: (703) 559-7701 – East Coast Operations Center (primary)
(310) 525-5591 – West Coast Operations Center (back-up)

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”).

² See *Satellite Communications Services Information; Actions Taken*, Report No. SES-01741, File No. SES-STA-20150316-00163 (Apr. 15, 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 also has a pending application 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-01740, File No. SES-STA-20150316-00162 (Apr. 15, 2015) (Public Notice).

⁵ Intelsat will handle the coordination.

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Request to speak with Harry Burnham or Kevin Bell.

In further support of this request, Intelsat incorporates by reference Exhibits A and B included with its original STA request, which contain 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, as well as a waiver request. Intelsat also notes that for purposes of the ABS-3A LEOP mission, it is seeking to 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 its original 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 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 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. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais