July 20, 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
Fillmore, California Earth Station E4132

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days—from July 27, 2015 through August 25, 2015—of the Special Temporary Authority ("STA")[1] 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 Eutelsat-115WB satellite that was launched on March 1, 2015.[2] The LEOP period is expected to last approximately 196 days.[3]

The Eutelsat-115WB LEOP operations are being performed in the following frequency bands: 6423.5 MHz and 6421.5 MHz in the uplink (LHCP), and 4199.0 MHz and 4199.8 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.[4] 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 Eutelsat-115WB 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.

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[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-01723, File No. SES-STA-20141217-00904 (Public Notice) (Feb. 4, 2015). The permanent orbital location for Eutelsat-115WB, which Intelsat understands is licensed by Mexico, will be at 114.9° W.L. The in-orbit testing location will be 114.9° W.L.

[3] Intelsat is seeking authority for an additional 30 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite.

[4] Intelsat will handle the coordination.

In further support of this request, Intelsat incorporates by reference Exhibits A and B, 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 Eutelsat-115WB 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 34.2 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 Eutelsat-115WB 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 extension request will allow Intelsat to help launch the Eutelsat-115WB satellite. This, in turn, will help ensure continuity of service at the 114.9° W.L. orbital location and thereby promotes the public interest.

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

Respectfully submitted,

Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais