

October 16, 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”)¹ for 30 days, commencing November 10, 2015, to use its Riverside, California C-band earth station—call sign E040125—to provide launch and early orbit phase (“LEOP”) services for the GSAT-15 satellite. GSAT-15 is expected to be launched November 10, 2015.² The LEOP period is expected to last approximately 10 days.³

The GSAT-15 LEOP operations will be performed in the following frequency bands: 6415.00 MHz and 6417.16 MHz in the uplink (RHCP), and 4198.272 MHz and 4199.28 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 GSAT-15 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.

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 The permanent orbital location for GSAT-15, which Intelsat understands is licensed by India, will be at 93.5° E.L. The in-orbit testing location will be 93.5° E.L.

³ Intelsat is seeking authority for 30 days to accommodate a possible launch delay.

⁴ Indian Space Research Organisation (“ISRO”), the manager of the GSAT-15 LEOP mission, will handle the coordination.

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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 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 GSAT-15 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 GSAT-15 launch, ISRO will control the spacecraft. ISRO 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 ISRO. 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 GSAT-15 satellite. This, in turn, will help ensure continuity of service at the 93.5° E.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