

February 3, 2016

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 Hagerstown, Maryland Earth Station KA258

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days, beginning February 13, 2016, of the Special Temporary Authority ("STA")¹ previously granted Intelsat to use its Hagerstown, Maryland Ku-band earth station—call sign KA258—to provide launch and early orbit phase ("LEOP") services for the SES-9 satellite.² As a result of a launch delay, SES-9 is now scheduled to be launched no earlier than February 22, 2016.³ Intelsat expects the LEOP period to last between fourteen and eighty days.⁴

The SES-9 LEOP operations will be performed in the following frequency bands: 13753.0 MHz, 13998.0 MHz, and 14496.0 MHz in the uplink (RHCP), and 11199.5 MHz, 11702.5 MHz, and 12246.5 MHz in the downlink (RHCP). The LEOP operations will 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 SES-9 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 See Satellite Communications Services information; Actions Taken, Report No. SES-01815, File No. SES-STA-20151207-00917 (Jan. 20, 2016).

 $^{^{3}}$ The permanent orbital location for SES-9, which Intelsat understands is licensed by Gibraltar, will be at 108.2° E.L. The in-orbit testing location will be 113.5° E.L.

⁴ Intelsat is seeking 30 days to accommodate the LEOP window of the medium-lift launch, which will vary based on the performance of the rocket.

⁵ Boeing, the manager of the SES-9 LEOP mission, will handle the coordination.

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In further support of this STA further extension request, Intelsat incorporates by reference Exhibits A, B, and C submitted with its original request, which contain a 13.75 - 14.0 GHz analysis and waiver requests.

Finally, Intelsat clarifies that during the SES-9 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 SES-9 satellite. This, in turn, will help will provide additional capacity at the 108.2° 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. Frady

Cynthia J. Grady Regulatory Counsel Intelsat Corporation

cc: Paul Blais