

EXHIBIT A

INTELSAT LICENSE LLC

**EUTELSAT-117WB 30-DAY LEOP
STA REQUEST**

**EARTH STATION E4132
FILLMORE, CALIFORNIA**

MARCH 22, 2016

Exhibit A

SECTIONS 25.137 AND 25.114

The legal and technical qualifications of the Eutelsat-117WB (a.k.a. Satmex-9) satellite have been approved by the Commission and are included herein by reference. Specifically, the legal information requested in Section 25.137 and the technical information requested in Section 25.114, including the Schedule S information, for the Eutelsat 117W satellite can be found in Satelites Mexicanos, S.A. de C.V.'s granted request to add the satellite to the Permitted Space Station List. *See Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-01103, File No. SAT-AMD-20141119-00123 (Aug 21, 2015) (Public Notice).

To the extent necessary, however, Intelsat respectfully requests a waiver of the need to provide additional technical information under Section 25.114 of the Commission's rules for its proposed LEOP service.¹ The Commission may grant a waiver for good cause shown.² The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.³ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁴ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause exists for a waiver of Section 25.114. Intelsat has provided in this STA request the technical information that is relevant to the LEOP services for which Intelsat seeks authorization. The remainder of the information sought by Section 25.114 is not required to determine potential harmful interference because Intelsat will perform the LEOP services on a non-interference basis. Nor is it required to protect adjacent satellites because LEOP service involves communications *prior* to the satellite attaining its final location in the geostationary orbit. In other words, during the LEOP mission, the earth station will not be communicating with a satellite permanently located in the geostationary orbit. Rather, it will be transmitting to a satellite traveling on its "transfer orbit" or "LEOP path", which starts immediately following its separation from a launch vehicle, and ends when the satellite reaches its geostationary orbital location. In the special circumstance of LEOP services, waiver of the need to provide additional technical information under Section 25.114 serves the public interest.

¹ 47 C.F.R. § 25.114.

² 47 C.F.R. §1.3.

³ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

⁴ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

EXHIBIT B

INTELSAT LICENSE LLC

**EUTELSAT-117WB 30-DAY LEOP
STA REQUEST**

**EARTH STATION E4132
FILLMORE, CALIFORNIA**

MARCH 22, 2016

Prepared By

COMSEARCH

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Prepared For

**Intelsat License LLC
Fillmore, California**

Temporary Transmit-Only Earth Station
Operation Dates: 04/01/2016 - 04/15/2016

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations. Verbal and written coordination was conducted with the below listed carriers on February 14, 2016.

Company

ABC Holding Company Inc.
AirSites2000, LLC
American Tower, LLC
Anaheim City, of
Area Energy LLC
Arizona Public Service Company (APS)
Arizona, State Of
BNS Electronics, Inc.
BNSF Railway Company
Boeing Company
California, State of
Calvary Chapel of Costa Mesa
CBS Broadcasting Inc
CBS Communication Services Inc
CCO SoCal I, LLC
CCO SoCal I, LLC
City of Glendale
City of Los Angeles Dept Water & Power
City of Montebello
City of Pomona
City of Torrance
City of Yuma
Coachella Valley Water District
Coast Community College District
Communication Services, Inc.
Conterra Ultra Broadband, LLC
DM Ventures, Inc. dba Warp2Biz
El Paso Natural Gas Company, LLC
Encina Communications Company
Entravision Holdings, LLC
Exxon Communications Company
Federal Communication Commission
Fisher Wireless Services, Inc.

Frazier Mountain Internet Service, Inc.
Freeport-McMoRan Oil & Gas LLC
Fresno MSA Limited Partnership
Frontier Communications of the Southwest
Glendale, City of
Global Telecom & Technology Americas
Global Telecom & Technology Americas, In
GovNET Licenses LLC
GTE Mobilnet of California LTD Partnersh
GTE Mobilnet of Santa Barbara LTD Ptnsh
GULF-CALIFORNIA BROADCAST COMPANY
HARRIS CORPORATION
INCOMM DIVISION CHURCH OF SCIENTOLOGY
ION Media Los Angeles License, Inc.
Kern Ed Telecom Consortium
Kern, County of
KTLA, LLC
LDM Engineering
Los Angeles City Info Technology Agency
Los Angeles County Dept of Public Works
Los Angeles County FCC Licensing Section
Los Angeles County Metro Transit Auth
Los Angeles SMSA Ltd. Partnership
LOS ANGELES UNIFIED SCHOOL DISTRICT
Metropolitan Water Dist of So California
MHO Networks
Mile High Inc.
MOBILE RELAY ASSOCIATES INC
New Cingular Wireless PCS LLC - AZ
New Cingular Wireless PCS - Los Angeles
New Cingular Wireless PCS LLC - N CAL
Nextel License Holdings 4 Inc.
Nextel of California Inc.
Nextweb Inc
Northrop Grumman Systems Corp.
NRJ TV LA License Co, LLC
Olympic Wireless, LLC
Orange, County of, CA
Pacific Bell Tel Com dba AT&T California
Pacific Gas and Electric Company
PACIFIC PIPELINE SYSTEM LLC
Regents of the University of California
Riverside, County of
San Bernardino County of California
San Diego, County of
Santa Barbara Cellular Systems, Ltd.
Santa Barbara, County of
Skyriver Communications
Southern California Edison Company
Southern California Gas Company
Southern California Regional Rail Auth.
Sparkplug Southwest, LLC
Sprint PCS
T-Mobile License LLC
Turn Wireless, LLC
TV MICROWAVES CO

Ultimate Internet Access, Inc
Union Pacific Railroad Company
University of California, HPWREN
Vectus, Inc
VENOCO, INC.
Ventura, County of
Verizon California Inc.
Verizon Wireless (VAW) LLC (Southern CA)
Verizon Wireless (VAW) LLC-N CA/NV
Verizon Wireless(VAW) LLC-AZ/CO/NM/NV/UT
Vintage Production California LLC
Western Technical Services
WWC License LLC - AZ/CO/NM/NV/UT

There are no unresolved interference objections with the station contained in these applications.

The following section presents the data pertinent to frequency coordination of the earth station that was circulated to all carriers within its coordination contours.

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Date: 02/14/2016
Job Number: 160214COMSGE03

Administrative Information

Status: TEMPORARY (Operation from 04/01/2016 to 04/15/2016)
Call Sign: TEMP04
Licensee Code: INTELS
Licensee Name: Intelsat License LLC

Site Information

FILLMORE, CA

Venue Name
Latitude (NAD 83): 34° 24' 22.0" N
Longitude (NAD 83): 118° 53' 37.4" W
Climate Zone: A
Rain Zone: 4
Ground Elevation (AMSL): 313.94 m / 1030.0 ft

Link Information

Satellite Type: Geostationary
Mode: TO - Transmit-Only
Modulation: Analog and Digital
Satellite Arc: 45.6° W to 192.2° West Longitude
Azimuth Range: 99.6° to 260.4°
Corresponding Elevation Angles: 5.1° / 5.0°
Antenna Centerline (AGL): 8.23 m / 27.0 ft

Antenna Information

Transmit - FCC32

Manufacturer: Scientific-Atlanta
Model: 3311
Gain / Diameter: 53.8 dBi / 10.0 m
3-dB / 15-dB Beamwidth: 0.40° / 0.60°

Max Available RF Power: (dBW/4 kHz) 10.9
(dBW/MHz) 34.9

Maximum EIRP: (dBW/4 kHz) 64.7
(dBW/MHz) 88.7
(dBW) 88.0

Interference Objectives: Long Term -154.0 dBW/4 kHz 20%
Short Term -131.0 dBW/4 kHz 0.0025%

Frequency Information

Transmit 6.1 GHz

Emission / Frequency Range (MHz): 850KFXD / 6421.3 - 6423.3

Max Great Circle Coordination Distance: 543.9 km / 337.9 mi
Precipitation Scatter Contour Radius: 396.3 km / 246.2 mi

Coordination Values		FILLMORE, CA	
Licensee Name		Intelsat License LLC	
Latitude (NAD 83)		34° 24' 22.0" N	
Longitude (NAD 83)		118° 53' 37.4" W	
Ground Elevation (AMSL)		313.94 m / 1030.0 ft	
Antenna Centerline (AGL)		8.23 m / 27.0 ft	
Antenna Model		Scientific-Atlanta 10 meter	
Antenna Mode		Transmit 6.1 GHz	
Interference Objectives:	Long Term	-154.0 dBW/4 kHz	20%
	Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	10.9 (dBW/4 kHz)		

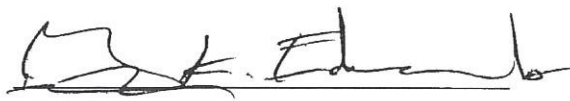
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	9.41	99.59	-10.00	100.00
5	9.28	94.62	-10.00	100.00
10	10.39	89.63	-10.00	100.00
15	10.81	84.65	-10.00	100.00
20	11.67	79.70	-10.00	100.00
25	12.11	74.75	-10.00	100.00
30	11.51	69.76	-10.00	100.00
35	10.87	64.77	-10.00	100.00
40	11.36	59.83	-10.00	100.00
45	12.04	54.93	-10.00	100.00
50	12.00	49.98	-10.00	100.00
55	11.61	45.01	-9.33	100.00
60	10.79	39.97	-8.04	100.00
65	9.78	34.91	-6.57	100.00
70	9.99	30.00	-4.93	100.00
75	9.18	24.95	-2.93	100.00
80	8.81	19.97	-0.51	100.00
85	8.14	14.94	2.64	105.61
90	7.27	9.88	7.14	132.90
95	5.88	4.70	15.20	194.78
100	6.25	0.44	40.98	531.89
105	6.17	3.67	17.90	205.45
110	4.75	8.51	8.76	172.71
115	2.86	13.60	3.66	183.84
120	2.00	18.02	0.61	188.68
125	1.86	21.93	-1.52	182.13
130	2.45	25.27	-3.06	157.83
135	2.61	28.73	-4.46	147.69
140	2.66	32.11	-5.67	141.67
145	2.81	35.20	-6.66	134.75
150	2.62	38.28	-7.57	134.91
155	3.21	40.44	-8.17	123.08
160	2.93	42.90	-8.81	125.83
165	3.48	44.21	-9.14	114.83
170	3.26	45.71	-9.50	117.38
175	3.12	46.63	-9.72	118.99
180	2.52	47.50	-9.92	129.29
185	2.35	47.40	-9.89	132.75

Coordination Values		FILLMORE, CA	
Licensee Name		Intelsat License LLC	
Latitude (NAD 83)		34° 24' 22.0" N	
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	Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	10.9 (dBW/4 kHz)		

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
190	2.28	46.64	-9.72	133.40
195	0.77	46.65	-9.72	182.25
200	0.45	45.00	-9.33	203.50
205	1.20	42.04	-8.59	168.69
210	0.96	39.53	-7.92	180.37
215	0.92	36.55	-7.07	186.12
220	0.00	33.92	-6.26	239.30
225	0.00	30.45	-5.09	244.97
230	0.00	26.83	-3.72	251.22
235	0.00	23.09	-2.08	259.79
240	0.00	19.24	-0.11	270.78
245	0.00	15.33	2.36	285.44
250	0.00	11.35	5.63	306.52
255	0.00	7.37	10.31	339.69
260	0.00	5.06	14.40	543.87
265	0.00	6.84	11.13	345.82
270	0.00	10.85	6.11	309.81
275	1.11	15.13	2.50	221.39
280	1.29	19.96	-0.51	203.55
285	2.94	24.70	-2.82	148.14
290	4.19	29.63	-4.79	119.31
295	4.00	34.63	-6.49	115.45
300	4.44	39.62	-7.95	104.00
305	3.70	44.64	-9.24	110.50
310	3.09	49.65	-10.00	118.53
315	2.77	54.65	-10.00	124.33
320	3.24	59.64	-10.00	115.70
325	3.81	64.63	-10.00	105.65
330	5.52	69.62	-10.00	100.00
335	7.47	74.63	-10.00	100.00
340	8.31	79.64	-10.00	100.00
345	8.76	84.63	-10.00	100.00
350	9.64	89.62	-10.00	100.00
355	9.46	94.61	-10.00	100.00

Certification

I hereby certify that I am the technically qualified person responsible for the preparation of the frequency coordination data contained in this report. I am familiar with Parts 101 and 25 of the FCC Rules and Regulations and I have either prepared or reviewed the frequency coordination data submitted with this report, and that it is complete and correct to the best of my knowledge and belief.

BY: 

Gary K. Edwards
Senior Manager
COMSEARCH
19700 Janelia Farm Boulevard
Ashburn, VA 20147

DATED: March 16, 2016

EXHIBIT C

INTELSAT LICENSE LLC

**EUTELSAT-117WB 30-DAY LEOP
STA REQUEST**

**EARTH STATION E4132
FILLMORE, CALIFORNIA**

MARCH 22, 2016

March 16, 2016.

Boeing Satellite Systems International, Inc.
Attn: Juliet Speir
Contracts Manager

Dear Ms. Speir,

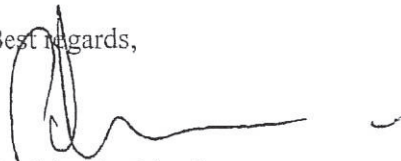
Reference is made to the Commercial Satellite Delivery Contract No. Contract No. BSS-SATMEX-12-001B by and between Boeing Satellite Systems International, Inc. (Boeing) and Eutelsat Latin America, S.A, (as successor of Satélites Mexicanos, S.A. de C.V.) ("Eutelsat") as amended.

By this mean, Eutelsat confirms that has already completed the FCC market access application process for E117WB and the Market Access has been granted. As a next step of the registration process for E117WB, Eutelsat is doing what is needed to register the E117WB satellite (F-4) before the United Nations Office for Outer Space Affairs, in conformity with the Registration Convention or General Assembly resolution 1721 B (XVI) and as recommended in General Assembly resolution 62/101.

Additionally, please rest assured that upon election and agreement with the corresponding Administration for the registry of the abovementioned satellite before the United Nations, we will properly make of knowledge of Boeing.

Should you require further information, please do not hesitate to contact us at your earliest convenience.

Best regards,



Patricio Northland
Legal Representative

C.C.P. Michael Neuman. Program Manager. Boeing.
James J. Peterka. ABS/Satmex Program Manager. 702SP Product Line Directorate. Boeing.
Franz Kerekes. 702SP Product Line Mission and Ground IPT Lead. Boeing.
Yohann Leroy. Chief Technical Officer. Eutelsat.
Arlen Kassighian. U.S. Satellites Programs Director. Department of Engineering. Eutelsat.
Mario García. CEO. Eutelsat Latin America.
Mariana Páez Robles Martínez. General Counsel. Satmex.
Jesús Gutiérrez Albores. Designated Joint Representative / Program Manager. Satmex.