

EXHIBIT A

INTELSAT LICENSE LLC

**EUTELSAT-117WB 180-DAY LEOP
STA REQUEST**

**EARTH STATION E000296
HAGERSTOWN, MARYLAND**

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 180-DAY LEOP
STA REQUEST**

**EARTH STATION E000296
HAGERSTOWN, MARYLAND**

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
Hagerstown, Maryland**

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

256Q Networks
AB Services LLC
AT&T Communications of Virginia, LLC
AT&T Communication of Maryland Inc.
AT&T Corp.
AT&T Wireless Services 3 LLC (PA)
AWC Networks
Access MLP Operating LLC
Adams County Department of Emergency Svc
Affiniti PA, LLC
Allentown SMSA Limited Partnership
Alltel Communications LLC - Western PA
Alltel Communications LLC-E OH WV
Alltel Communications LLC-Southern VA
American Electric Power Service Co
Appalachia Engineering Services
Argos Engineering, LLC
Atlantic Broadband (Penn), LLC
Atlantic City Electric Company
Atlantic, County of
Auburn Data Systems, LLC
Augusta, County of
BAY BROADBAND COMMUNICATIONS LLC
BLAIR COUNTY 911
Baltimore County of Maryland
Baltimore Gas and Electric Company
Beaver Springs Faith Baptist Church, Inc
Bedford, County of
Believe Wireless, LLC
Berks County Department of Emergency Ser
Blue Ridge Carriers
Blueline Communications
CLEARFIELD, COUNTY OF
CNG Transmission Corporation
CROWN COMMUNICATION, INC.
Cambria, County of

Capital Communications of America
Caroline County, VA
Carroll, County of
Cellco Partnership - Bridgeville, PA/WV
Cellco Partnership - Southern Virginia
Cellco Partnership- PA Region
Cellco Partnership-WDC/Baltimore
Cellco Prtnrshp - Phil. Tri-State Rgn
Centre, County of
Charles, County of
Chester, County of
China Cat Productions LLC
Citynet
Clinton, County of
Columbia Gas Transmission Corporation
Commonwealth of Pennsylvania
Commonwealth of Pennsylvania-Radio Proj.
Comprehensive Wireless LLC
Conterra Ultra Broadband, LLC
Coral Reef Technologies Ltd
Coralinks
County of Burlington, Public Safety Cntr
County of Camden
County of Fayette
County of Frederick
County of Lycoming
County of York
DAUPHIN COUNTY EMERGENCY MANAGEMENT
Delaware County (PA) Emergency Services
Delaware Division of Communications
Delmarva Broadcasting Company
Delmarva Power and Light Company
ECW Wireless, LLC
EG Broadcast Newco Corp
Eastern MLG LLC
Electric Railroad, LLC
Enoch Pratt Free Library
Exelon Generation Company, LLC
FELHC, INC
Federal Communication Commission
Frederick County
Fundamental Broadcasting LLC
GETWIRELESS.NET
GREAT SCOTT BROADCASTING
GW Networks
Garden State Transmissions
Geodesic Networks LLC
Gloucester, County of
Greene, County of (PA)
Hanover, County of
Hardy Cellular Telephone Company
Harrisonburg-Rockingham ECC
Henrico County
High Voltage Communications LLC (CFN)
Huntingdon, County of
Indiana, County of

JEFFERSON COUNTY OF PENNSYLVANIA
Jefferson Microwave, LLC
Juniata County Emergency Services
King and Queen County
Kryptick Technologies
Lancaster County-Wide Communications
Limitless Mobile, LLC
Live Mobile Group
Loudoun, County of
MGW Networks, LLC
MVC Research. LLC
Maryland Public Broadcasting Commission
Maryland State Highway Administration
Maryland, State of - Dept.of Info & Tech
Montgomery County Of
National Tower Company LLC
New Cingular Wireless PCS LLC -NJ
New Cingular Wireless PCS - Maryland
New Cingular Wireless PCS LLC - DC
New Cingular Wireless PCS LLC - VA
New Cingular Wireless PCS LLC- WV/NC/SC
New Cingular Wireless PCS LLC-DE/NH/RI
New Cingular Wireless PCS, LLC - PA
New Jersey Turnpike Authority-Pkwy Div
New Jersey, State of -NJ Transit
New Line Networks, LLC
Norfolk Southern Railway
Northumberland, County of
OHIO POWER COMPANY
Old Dominion LLC
PA Communications
PEG Bandwidth, LLC
PRESTON COUNTY OFFICE OF EMERGENCY MANAG
PSEG Services Corporation
Peco Energy Company
Penn Service Microwave Co., Inc.
Pennsylvania Turnpike Commission
Peoples Natural Gas Company LLC
Perseus Technology Holdings USA Inc.
Pitt Power
Pittsburgh SMSA Limited Partnership
Prince George's County
Prince William, County of
RAPPAHANNOCK ELECTRIC COOPERATIVE
Radio One Inc
Rendezvous Communications LLC
Rockbridge Reg. Pub Safety Comm Ctr
Rural Broadband Network Services LLC
SCS Networks
SHENANDOAH VALLEY ELECTRIC COOPERATIVE
SW Networks
Somerset, County of
South Central Task Force (SCTFNET)
Southern Maryland Electric Cooperative I
Spotsylvania, County of
Sprint Spectrum L.P.

Sprintcom, Inc
St. Mary's County of (MD)
Stafford, County of
Standard Backhaul Communications LLC
State of Maryland, MIEMSS
Texas Eastern Communications, LLC
Thought Transmissions, LLC
Torelco LLC
Transcontinental Gas Pipeline Corp.
Turtle Networks 6562
US Cellular Operating Company, LLC (WI)
USCOC of Cumberland, Inc.
USCOC of Virginia RSA #3, Inc.
USOC of Pennsylvania RSA No 10 B2 Inc.
Verizon Maryland, Inc.
Verizon Wireless (VAW) LLC - Delaware/NJ
Verizon Wireless (VAW) LLC - Maryland
Verizon Wireless (VAW) LLC - W/B/V Mkts
Verizon Wireless (VAW) LLC-Pennsylvania
Verizon Wireless VAW LLC - West Virginia
Verizon Wireless VAW LLC-Southern VA
Virginia RSA 5 Limited Partnership
Virginia Broadband, LLC
Virginia Cellular LLC
Virginia Department of State Police
Virginia Electric & Power Company
Virginia PCS Alliance, L.C.
WHEELING POWER COMPANY
WITF Inc.
WV DHHR BPH, Office of EMS, Com. Div.
Washington D.C. SMSA L.P.
Washington Gas Light Company
Washington Suburban Sanitary Commission
Washington, County of
Weblin Holdings LLC
Wireless Internetwork LLC
World Class Wireless, LLC
YAB Mobile
iSignal
xWave Engineering LLC

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: 02/09/2016
 Job Number: <PCNJobCode>

Administrative Information

Status ENGINEER PROPOSAL
 Call Sign <PCNCallSign>
 Licensee Code INTELS
 Licensee Name Intelsat License LLC

Site Information HAGERSTOWN, MD

Venue Name
 Latitude (NAD 83) 39° 35' 54.0" N
 Longitude (NAD 83) 77° 45' 35.0" W
 Climate Zone A
 Rain Zone 2
 Ground Elevation (AMSL) 173.74 m / 570.0 ft

Link Information

Satellite Type Geostationary
 Mode TO - Transmit-Only
 Modulation Digital
 Satellite Arc 6° W to 149° West Longitude
 Azimuth Range 101.9° to 257.8°
 Corresponding Elevation Angles 5.3° / 5.7°
 Antenna Centerline (AGL) 5.79 m / 19.0 ft

Antenna Information Transmit - FCC32

Manufacturer Vertex
 Model 9 KPC
 Gain / Diameter 53.5 dBi / 9.0 m
 3-dB / 15-dB Beamwidth 0.36° / 0.67°

Max Available RF Power (dBW/4 kHz) 7.2
 (dBW/MHz) 31.2

Maximum EIRP (dBW/4 kHz) 60.7
 (dBW/MHz) 84.7

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) 850KG7W / 6421.3 - 6423.3

Max Great Circle Coordination Distance 507.1 km / 315.0 mi
 Precipitation Scatter Contour Radius 431.6 km / 268.1 mi

Coordination Values		HAGERSTOWN, MD	
Licensee Name		Intelsat License LLC	
Latitude (NAD 83)		39° 35' 54.0" N	
Longitude (NAD 83)		77° 45' 35.0" W	
Ground Elevation (AMSL)		173.74 m / 570.0 ft	
Antenna Centerline (AGL)		5.79 m / 19.0 ft	
Antenna Model		Vertex 9 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		7.2 (dBW/4 kHz)	


Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	101.81	-10.00	207.10
5	0.00	96.84	-10.00	207.10
10	0.00	91.86	-10.00	207.10
15	0.00	86.88	-10.00	207.10
20	0.00	81.90	-10.00	207.10
25	0.00	76.92	-10.00	207.10
30	0.00	71.95	-10.00	207.10
35	0.00	66.97	-10.00	207.10
40	0.00	62.00	-10.00	207.10
45	0.00	57.03	-10.00	207.10
50	0.00	52.06	-10.00	207.10
55	0.00	47.09	-9.82	207.79
60	0.00	42.14	-8.62	212.59
65	0.00	37.19	-7.26	218.19
70	0.00	32.26	-5.72	224.84
75	0.00	27.34	-3.92	232.91
80	0.00	22.47	-1.79	243.02
85	0.00	17.65	0.83	255.60
90	0.00	12.98	4.17	274.11
95	0.00	8.66	8.56	301.31
100	0.00	5.61	13.27	507.05
105	0.00	6.15	12.28	371.03
110	0.00	9.60	7.45	294.11
115	0.00	13.27	3.93	272.70
120	0.00	16.89	1.31	258.14
125	0.00	20.41	-0.75	248.15
130	0.00	23.83	-2.43	239.94
135	0.00	27.11	-3.83	233.34
140	0.00	30.23	-5.01	227.97
145	0.00	33.14	-6.01	223.55
150	0.00	35.82	-6.85	219.92
155	0.00	38.20	-7.55	216.96
160	0.00	40.26	-8.12	214.61
165	0.00	41.93	-8.56	212.81
170	0.00	43.16	-8.88	211.54
175	0.00	43.92	-9.07	210.78
180	0.00	44.18	-9.13	210.53
185	0.00	43.92	-9.07	210.78

Coordination Values		HAGERSTOWN, MD	
Licensee Name		Intelsat License LLC	
Latitude (NAD 83)		39° 35' 54.0" N	
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Ground Elevation (AMSL)		173.74 m / 570.0 ft	
Antenna Centerline (AGL)		5.79 m / 19.0 ft	
Antenna Model		Vertex 9 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		7.2 (dBW/4 kHz)	

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
190	0.00	43.16	-8.88	211.54
195	0.00	41.93	-8.56	212.81
200	0.00	40.26	-8.12	214.61
205	0.00	38.20	-7.55	216.96
210	0.00	35.81	-6.85	219.92
215	0.00	33.14	-6.01	223.55
220	0.00	30.22	-5.01	227.97
225	0.00	27.11	-3.83	233.34
230	0.00	23.83	-2.43	239.93
235	0.00	20.42	-0.75	248.14
240	0.00	16.89	1.31	258.16
245	0.00	13.28	3.92	272.68
250	0.00	9.59	7.46	294.19
255	0.00	6.33	11.96	378.50
260	0.00	6.11	12.35	489.18
265	0.00	9.18	7.93	297.19
270	0.00	13.46	3.77	271.82
275	0.00	18.11	0.55	254.16
280	0.00	22.90	-2.00	242.02
285	0.00	27.76	-4.09	232.16
290	0.00	32.66	-5.85	224.24
295	0.00	37.59	-7.38	217.70
300	0.00	42.53	-8.72	212.18
305	0.00	47.48	-9.91	207.44
310	0.00	52.44	-10.00	207.10
315	0.00	57.40	-10.00	207.10
320	0.00	62.37	-10.00	207.10
325	0.00	67.34	-10.00	207.10
330	0.00	72.31	-10.00	207.10
335	0.00	77.28	-10.00	207.10
340	0.00	82.26	-10.00	207.10
345	0.00	87.23	-10.00	207.10
350	0.00	92.21	-10.00	207.10
355	0.00	97.18	-10.00	207.10

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 180-DAY LEOP
STA REQUEST**

**EARTH STATION E000296
HAGERSTOWN, MARYLAND**

MARCH 22, 2016

March 16, 2016.

Boeing Satellite Systems International, Inc.

Attn: Juliet Speir
Contracts Manager

Dear Ms. Speir,

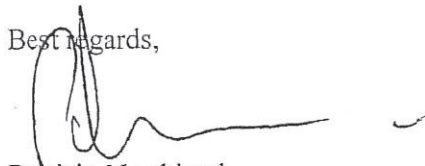
Reference is made to the Commercial Satellite Delivery Contract No. Contract No. BSS-SATMEX-12-001B by and between Boeing Satellite Systems International, Inc. (Boeing) and Eutelsat Latin America, S.A, (as successor of Satélites Mexicanos, S.A. de C.V.) ("Eutelsat") as amended.

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.