

**EXHIBIT A**

**INTELSAT LICENSE LLC**

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

**EARTH STATION E040125  
RIVERSIDE, 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.<sup>1</sup> The Commission may grant a waiver for good cause shown.<sup>2</sup> The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.<sup>3</sup> 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.<sup>4</sup> 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.

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<sup>1</sup> 47 C.F.R. § 25.114.

<sup>2</sup> 47 C.F.R. §1.3.

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

<sup>4</sup> *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 E040125  
RIVERSIDE, 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  
Nuevo, 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  
Alltel Comm Southwest Holdings Inc.  
Anaheim City, of  
Arizona Public Service Company (APS)  
Arizona, State Of  
BNSF Railway Company  
CCO SoCal I, LLC  
CNG Communications, Inc.  
California, State of  
Calvary Chapel of Costa Mesa  
Cellco Partnership - Southern California  
City of Casa Grande  
City of Los Angeles Dept Water & Power  
City of Montebello  
City of Yuma  
Coachella Valley Water District  
Coast Community College District  
Commnet Four Corners, LLC  
DM Ventures, Inc. dba Warp2Biz  
DRS Technical Services  
Encina Communications Company  
Entravision Holdings, LLC  
Federal Communication Commission  
Fisher Wireless Services, Inc.  
Fresno MSA Limited Partnership  
Gila River Cellular General Partnership  
Glendale, City of  
GovNET Licenses LLC  
ION Media Los Angeles License, Inc.  
KTLA, LLC  
Kern Ed Telecom Consortium  
Kern, County of  
LDM Engineering  
LOS ANGELES UNIFIED SCHOOL DISTRICT

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  
MHO Networks  
MOBILE RELAY ASSOCIATES INC  
Maricopa County Wireless Systems  
Metropolitan Water Dist of So California  
NRJ TV LA License Co, LLC  
New Cingular Wireless PCS LLC - AZ  
New Cingular Wireless PCS - Los Angeles  
New Cingular Wireless PCS LLC - N CAL  
New Cingular Wireless PCS LLC -San Diego  
Nextel License Holdings 4 Inc.  
Nextel of California Inc.  
Norris, Samuel O  
Northrop Grumman Systems Corp.  
Olympic Wireless, LLC  
Orange, County of, CA  
Pacific Bell Tel Com dba AT&T California  
Phoenix, City of  
QUALCOMM INC.  
Qwest Corporation  
Regional 3Cs  
Riverside, County of  
San Bernardino County of California  
San Diego Broadband  
San Diego County Water Authority  
San Diego Gas & Electric Company  
San Diego, City of  
San Diego, County of  
Skyriver Communications  
Southern California Edison Company  
Southern California Gas Company  
Southern California Regional Rail Auth.  
Sprint Spectrum L.P.  
Sprint Telephony PCS, L.P.  
Station Venture Operations, LP  
T-Mobile License LLC  
TV MICROWAVES CO  
Table Top Telephone Company  
Telink Networks SW, LLC  
Time Warner Cable Pacific West LLC  
Tucson Electric Power Company  
Turn Wireless, LLC  
Ultimate Internet Access, Inc  
Union Pacific Railroad Company  
University of California, HPWREN  
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  
Western Technical Services  
White, Fred K



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: 160214COMSGE01

### 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

#### NUEVO, CA

Venue Name:  
Latitude (NAD 83): 33° 47' 43.6" N  
Longitude (NAD 83): 117° 5' 20.4" W  
Climate Zone: A  
Rain Zone: 4  
Ground Elevation (AMSL): 566.62 m / 1859.0 ft

### Link Information

Satellite Type: Geostationary  
Mode: TO - Transmit-Only  
Modulation: Analog and Digital  
Satellite Arc: 45° W to 170° West Longitude  
Azimuth Range: 100.2° to 247.2°  
Corresponding Elevation Angles: 6.2° / 22.0°  
Antenna Centerline (AGL): 7.32 m / 24.0 ft

### Antenna Information

#### Transmit - FCC32

Manufacturer: Vertex  
Model: 11 Meter  
Gain / Diameter: 55.5 dBi / 11.0 m  
3-dB / 15-dB Beamwidth: 0.29° / 0.54°

Max Available RF Power: (dBW/4 kHz) 8.6  
(dBW/MHz) 32.6

Maximum EIRP: (dBW/4 kHz) 64.1  
(dBW/MHz) 88.1

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: 491.7 km / 305.5 mi  
Precipitation Scatter Contour Radius: 316.8 km / 196.8 mi

Coordination Values		NUEVO, CA	
Licensee Name		Intelsat License LLC	
Latitude (NAD 83)		33° 47' 43.6" N	
Longitude (NAD 83)		117° 5' 20.4" W	
Ground Elevation (AMSL)		566.62 m / 1859.0 ft	
Antenna Centerline (AGL)		7.32 m / 24.0 ft	
Antenna Model		Vertex 11 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	8.6 (dBW/4 kHz)		

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	0.91	100.15	-10.00	160.90
5	2.23	95.18	-10.00	125.83
10	1.88	90.19	-10.00	133.16
15	2.42	85.20	-10.00	122.25
20	2.49	80.21	-10.00	120.85
25	2.56	75.22	-10.00	119.49
30	3.50	70.22	-10.00	102.07
35	3.34	65.23	-10.00	105.02
40	3.36	60.23	-10.00	104.68
45	3.28	55.24	-10.00	106.09
50	2.88	50.27	-10.00	113.58
55	2.50	45.31	-9.40	122.87
60	2.77	40.31	-8.14	122.67
65	3.44	35.29	-6.69	115.99
70	3.10	30.33	-5.05	128.10
75	3.19	25.36	-3.10	133.79
80	3.76	20.33	-0.70	132.86
85	3.33	15.45	2.28	152.87
90	3.39	10.56	6.41	174.12
95	2.51	6.34	11.94	220.14
100	2.99	3.18	19.45	491.65
105	3.63	5.38	13.72	205.53
110	3.84	9.29	7.80	171.48
115	3.70	13.36	3.86	152.77
120	3.87	17.17	1.13	137.08
125	3.84	21.02	-1.07	130.12
130	4.49	24.32	-2.65	114.61
135	3.88	28.30	-4.29	117.10
140	4.24	31.47	-5.45	107.49
145	4.11	34.76	-6.53	105.27
150	4.48	37.41	-7.32	100.00
155	4.67	39.84	-8.01	100.00
160	4.09	42.53	-8.72	100.00
165	4.55	43.90	-9.06	100.00
170	4.85	44.86	-9.30	100.00
175	5.79	44.68	-9.25	100.00
180	6.19	44.52	-9.21	100.00
185	6.91	43.57	-8.98	100.00



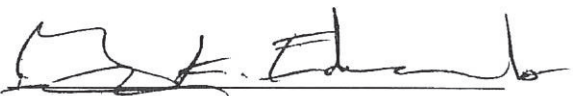
Coordination Values		NUEVO, CA	
Licensee Name		Intelsat License LLC	
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Antenna Mode		Transmit 6.1 GHz	
Interference Objectives:	Long Term	-154.0 dBW/4 kHz	20%
	Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	8.6 (dBW/4 kHz)		

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
190	7.27	42.53	-8.72	100.00
195	6.99	41.64	-8.49	100.00
200	6.27	40.64	-8.22	100.00
205	5.71	38.99	-7.77	100.00
210	5.71	36.45	-7.04	100.00
215	6.70	32.84	-5.91	100.00
220	7.49	29.16	-4.62	100.00
225	7.03	26.16	-3.44	100.00
230	5.65	23.57	-2.31	102.80
235	6.10	19.95	-0.50	105.35
240	5.73	17.76	0.76	114.08
245	5.59	16.57	1.52	118.52
250	5.18	17.07	1.20	121.20
255	4.95	18.72	0.19	119.58
260	4.51	21.57	-1.35	119.32
265	4.74	24.62	-2.78	110.78
270	4.38	28.54	-4.39	109.45
275	4.51	32.48	-5.79	102.47
280	4.14	36.88	-7.17	102.48
285	3.19	41.60	-8.48	113.55
290	2.77	46.16	-9.61	117.06
295	1.04	51.16	-10.00	154.91
300	0.82	55.70	-10.00	165.96
305	0.00	60.40	-10.00	212.66
310	0.00	64.94	-10.00	212.66
315	0.00	69.50	-10.00	212.66
320	0.00	74.10	-10.00	212.66
325	0.00	78.71	-10.00	212.66
330	0.00	83.34	-10.00	212.66
335	0.00	87.97	-10.00	212.66
340	0.00	92.60	-10.00	212.66
345	0.00	97.24	-10.00	212.66
350	0.00	101.86	-10.00	212.66
355	0.00	105.10	-10.00	212.66

## 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 E040125  
RIVERSIDE, CALIFORNIA**

**MARCH 22, 2016**

March 16, 2016.

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

Dear Ms. Speir,

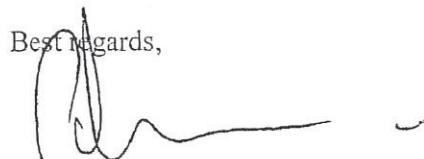
Reference is made to the Commercial Satellite Delivery Contract No. Contract No. BSS-SATMEX-12-001B by and between Boeing Satellite Systems International, Inc. (Boeing) and Eutelsat Latin America, S.A, (as successor of Satélites Mexicanos, S.A. de C.V.) ("Eutelsat") as amended.

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.