

EXHIBIT A

INTELSAT LICENSE LLC

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

**EARTH STATION E040174
CASTLE ROCK, COLORADO**

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 E040174
CASTLE ROCK, COLORADO**

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
Castle Rock, Colorado**

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

AT&T Mobility Spectrum LLC - CO
AirLife Denver
Arvada Police Dept.
BNSF Railway Company
Black Hawk Police Department
Black Hills Corporation
Boulder, County of
CBS Communication Services Inc
CBS Television Stations
Cellular Inc. Network Corporation
City of Aurora
City of Colorado Springs
City of Lakewood, CO
Colorado Interstate Gas Company
Colorado Springs Utilities
County of Pueblo
Douglas County Sheriff's Office
Entravision Holdings, LLC
FONES WEST DIGITAL SYSTEMS INC.
Federal Communication Commission
Gilpin County Sheriff's Office
Gogo LLC
Gray Television Licensee, LLC
Infrastructure Networks, Inc.
Intermountain Rural Electric Association
Kellin Communications

Live Wire Networks, Inc.
MHO Networks
Multimedia Holdings Corporation
NE Colorado Cellular, Inc.
New Cingular Wireless PCS LLC -
Colorado
Nex-Tech Wireless, LLC
Olympic Wireless, LLC
Qwest Corporation
Roggen Telephone Enterprises, Inc.
Sangre de Cristo Communications, LLC
Sprint Communications Company, LP
Sprint Spectrum LP DBA Sprint PCS
Sprintcom, Inc
State of Colorado
Tallgrass Operations, LLC
Tri-State Generation & Transmission Assn
Tribune Broadcasting Denver License, LLC
University Corp for Atmospheric Research
Verizon Wireless (VAW) LLC -
CO/ID/MT/WY
Xcel Energy Services, Inc.
AT&T Mobility Spectrum LLC - CO
AirLife Denver
Arvada Police Dept.
BNSF Railway Company
Black Hawk Police Department
Black Hills Corporation
Boulder, County of
CBS Communication Services Inc
CBS Television Stations
Cellular Inc. Network Corporation
City of Aurora
City of Colorado Springs
City of Lakewood, CO
Colorado Interstate Gas Company
Colorado Springs Utilities
County of Pueblo
Douglas County Sheriff's Office
Entravision Holdings, LLC
FONES WEST DIGITAL SYSTEMS INC.
Federal Communication Commission
Gilpin County Sheriff's Office
Gogo LLC
Gray Television Licensee, LLC

Infrastructure Networks, Inc.
Intermountain Rural Electric Association
Kellin Communications
Live Wire Networks, Inc.
MHO Networks
Multimedia Holdings Corporation
NE Colorado Cellular, Inc.
New Cingular Wireless PCS LLC -
Colorado
Nex-Tech Wireless, LLC
Olympic Wireless, LLC
Qwest Corporation
Roggen Telephone Enterprises, Inc.
Sangre de Cristo Communications, LLC
Sprint Communications Company, LP
Sprint Spectrum LP DBA Sprint PCS
Sprintcom, Inc
State of Colorado
Tallgrass Operations, LLC
Tri-State Generation & Transmission Assn
Tribune Broadcasting Denver License, LLC
University Corp for Atmospheric Research
Verizon Wireless (VAW) LLC -
CO/ID/MT/WY
Xcel Energy Services, Inc.
AT&T Mobility Spectrum LLC - CO
AirLife Denver
Arvada Police Dept.
BNSF Railway Company
Black Hawk Police Department
Black Hills Corporation
Boulder, County of
CBS Communication Services Inc
CBS Television Stations
Cellular Inc. Network Corporation
City of Aurora
City of Colorado Springs
City of Lakewood, CO
Colorado Interstate Gas Company
Colorado Springs Utilities
County of Pueblo
Douglas County Sheriff's Office
Entravision Holdings, LLC
FONES WEST DIGITAL SYSTEMS INC.
Federal Communication Commission

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: 160214COMSGE02

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

CASTLE ROCK, CO
Venue Name: C23
Latitude (NAD 83): 39° 16' 33.0" N
Longitude (NAD 83): 104° 48' 34.0" W
Climate Zone: A
Rain Zone: 2
Ground Elevation (AMSL): 2088.0 m / 6850.4 ft

Link Information

Satellite Type: Geostationary
Mode: TO - Transmit-Only
Modulation: Digital
Satellite Arc: 50° W to 60° West Longitude
Azimuth Range: 114.1° to 122.5°
Corresponding Elevation Angles: 18.2° / 25.5°
Antenna Centerline (AGL): 5.49 m / 18.0 ft

Antenna Information

Transmit - FCC32
Manufacturer: Vertex
Model: 9 Meter
Gain / Diameter: 53.8 dBi / 9.0 m
3-dB / 15-dB Beamwidth: 0.20° / 0.40°

Max Available RF Power (dBW/4 kHz): 3.7
(dBW/MHz): 27.7

Maximum EIRP (dBW/4 kHz): 57.5
(dBW/MHz): 81.5

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: 235.9 km / 146.6 mi
Precipitation Scatter Contour Radius: 267.2 km / 166.0 mi

Coordination Values		CASTLE ROCK, CO	
Licensee Name		Intelsat License LLC	
Latitude (NAD 83)		39° 16' 33.0" N	
Longitude (NAD 83)		104° 48' 34.0" W	
Ground Elevation (AMSL)		2088.0 m / 6850.4 ft	
Antenna Centerline (AGL)		5.49 m / 18.0 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	3.7 (dBW/4 kHz)		

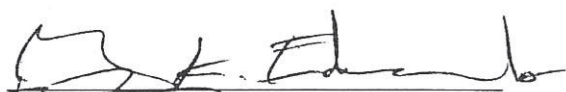
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	5.33	113.41	-10.00	100.00
5	4.79	108.52	-10.00	100.00
10	3.89	103.61	-10.00	100.00
15	4.01	98.78	-10.00	100.00
20	3.85	93.93	-10.00	100.00
25	3.58	89.09	-10.00	100.00
30	3.74	84.25	-10.00	100.00
35	3.35	79.43	-10.00	100.00
40	2.87	74.64	-10.00	100.00
45	2.58	69.87	-10.00	101.35
50	2.50	65.10	-10.00	102.77
55	1.71	60.47	-10.00	119.86
60	1.36	55.83	-10.00	128.53
65	0.54	51.37	-10.00	160.52
70	0.00	46.96	-9.79	196.16
75	0.00	42.48	-8.70	200.31
80	0.00	38.11	-7.53	204.81
85	0.00	33.88	-6.25	208.09
90	0.00	29.86	-4.88	213.56
95	0.23	25.99	-3.37	216.99
100	0.00	22.88	-1.99	225.85
105	0.00	20.29	-0.68	231.71
110	0.00	18.67	0.22	235.91
115	0.28	17.98	0.63	229.46
120	0.36	18.81	0.14	219.31
125	0.30	20.91	-1.01	219.74
130	0.52	23.66	-2.35	196.72
135	0.43	27.02	-3.79	198.43
140	0.55	30.04	-4.94	183.61
145	1.02	32.74	-5.88	152.14
150	1.54	35.82	-6.85	133.76
155	1.39	39.64	-7.95	133.68
160	1.46	43.54	-8.97	129.47
165	1.44	47.66	-9.95	126.58
170	1.53	51.86	-10.00	124.19
175	1.93	56.07	-10.00	114.51
180	2.33	60.38	-10.00	106.24
185	2.57	64.81	-10.00	101.36

Coordination Values		CASTLE ROCK, CO	
Licensee Name		Intelsat License LLC	
Latitude (NAD 83)		39° 16' 33.0" N	
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Interference Objectives:	Long Term	-154.0 dBW/4 kHz	20%
	Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	3.7 (dBW/4 kHz)		

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
190	2.96	69.29	-10.00	100.00
195	3.16	73.84	-10.00	100.00
200	3.18	78.44	-10.00	100.00
205	2.89	83.07	-10.00	100.00
210	2.65	87.69	-10.00	100.00
215	2.70	92.30	-10.00	100.00
220	3.32	96.93	-10.00	100.00
225	3.28	101.55	-10.00	100.00
230	3.48	106.18	-10.00	100.00
235	3.42	110.76	-10.00	100.00
240	3.40	115.33	-10.00	100.00
245	3.51	119.88	-10.00	100.00
250	3.53	124.37	-10.00	100.00
255	3.67	128.84	-10.00	100.00
260	3.61	133.17	-10.00	100.00
265	3.77	137.48	-10.00	100.00
270	3.98	141.69	-10.00	100.00
275	4.00	145.63	-10.00	100.00
280	4.02	149.30	-10.00	100.00
285	4.64	153.05	-10.00	100.00
290	5.69	156.73	-10.00	100.00
295	5.86	159.06	-10.00	100.00
300	5.20	159.59	-10.00	100.00
305	5.01	159.41	-10.00	100.00
310	5.30	158.55	-10.00	100.00
315	5.39	155.58	-10.00	100.00
320	4.95	151.07	-10.00	100.00
325	4.63	146.47	-10.00	100.00
330	4.54	141.87	-10.00	100.00
335	4.47	137.20	-10.00	100.00
340	5.31	132.67	-10.00	100.00
345	5.69	127.96	-10.00	100.00
350	5.73	123.14	-10.00	100.00
355	5.67	118.30	-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 180-DAY LEOP
STA REQUEST**

**EARTH STATION E040174
CASTLE ROCK, COLORADO**

MARCH 22, 2016

March 16, 2016.

Boeing Satellite Systems International, Inc.

Attn: Juliet Speir
Contracts Manager

Dear Ms. Speir,

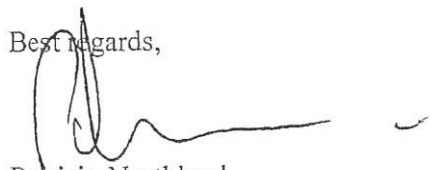
Reference is made to the Commercial Satellite Delivery Contract No. Contract No. BSS-SATMEX-12-001B by and between Boeing Satellite Systems International, Inc. (Boeing) and Eutelsat Latin America, S.A, (as successor of Satélites Mexicanos, S.A. de C.V.) ("Eutelsat") as amended.

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.