

**EXHIBIT A**

**INTELSAT LICENSE LLC**

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

**EARTH STATION KA275  
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.<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 KA275  
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  
Torellco 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: 02/14/2016  
 Job Number: 160214COMSGE05

**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**

**HAGERSTOWN, MD**  
 Venue Name  
 Latitude (NAD 83): 39° 35' 54.7" N  
 Longitude (NAD 83): 77° 45' 35.3" W  
 Climate Zone: A  
 Rain Zone: 2  
 Ground Elevation (AMSL): 171.3 m / 562.0 ft

**Link Information**

Satellite Type: Geostationary  
 Mode: TO - Transmit-Only  
 Modulation: Analog and 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): 12.5 m / 41.0 ft

**Antenna Information**

**Transmit - FCC32**  
 Manufacturer: GD Satcom  
 Model: 19M CFPA  
 Gain / Diameter: 59.1 dBi / 19.0 m  
 3-dB / 15-dB Beamwidth: 0.20° / 0.40°

Max Available RF Power (dBW/4 kHz): -2.7  
 (dBW/MHz): 21.3

Maximum EIRP (dBW/4 kHz): 56.4  
 (dBW/MHz): 80.4

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: 453.8 km / 281.9 mi  
 Precipitation Scatter Contour Radius: 101.4 km / 63.0 mi



<b>Coordination Values</b>	<b>HAGERSTOWN, MD</b>	
Licensee Name	Intelsat License LLC	
Latitude (NAD 83)	39° 35' 54.7" N	
Longitude (NAD 83)	77° 45' 35.3" W	
Ground Elevation (AMSL)	171.3 m / 562.0 ft	
Antenna Centerline (AGL)	12.5 m / 41.0 ft	
Antenna Model	GD Satcom 19 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	-2.7 (dBW/4 kHz)	

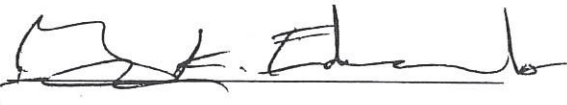
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	101.81	-10.00	170.66
5	0.00	96.84	-10.00	170.66
10	0.00	91.86	-10.00	170.66
15	0.00	86.88	-10.00	170.66
20	0.00	81.90	-10.00	170.66
25	0.00	76.92	-10.00	170.66
30	0.00	71.95	-10.00	170.66
35	0.00	66.97	-10.00	170.66
40	0.00	62.00	-10.00	170.66
45	0.00	57.03	-10.00	170.66
50	0.00	52.06	-10.00	170.66
55	0.00	47.09	-9.82	171.34
60	0.00	42.14	-8.62	176.03
65	0.00	37.19	-7.26	181.28
70	0.00	32.26	-5.72	187.24
75	0.00	27.34	-3.92	194.13
80	0.00	22.47	-1.79	202.28
85	0.00	17.65	0.83	210.76
90	0.00	12.98	4.17	224.77
95	0.00	8.66	8.56	245.21
100	0.00	5.61	13.27	453.75
105	0.00	6.15	12.28	314.02
110	0.00	9.60	7.45	239.82
115	0.00	13.27	3.93	223.71
120	0.00	16.89	1.31	212.69
125	0.00	20.41	-0.75	204.62
130	0.00	23.83	-2.43	199.84
135	0.00	27.11	-3.83	194.49
140	0.00	30.23	-5.01	189.96
145	0.00	33.14	-6.01	186.11
150	0.00	35.82	-6.85	182.86
155	0.00	38.20	-7.55	180.15
160	0.00	40.26	-8.12	177.95
165	0.00	41.93	-8.56	176.24
170	0.00	43.16	-8.88	175.02
175	0.00	43.92	-9.07	174.29
180	0.00	44.18	-9.13	174.04
185	0.00	43.92	-9.07	174.28

Coordination Values		HAGERSTOWN, MD	
Licensee Name		Intelsat License LLC	
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Antenna Model		GD Satcom 19 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		-2.7 (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	175.02
195	0.00	41.93	-8.56	176.24
200	0.00	40.26	-8.12	177.95
205	0.00	38.20	-7.55	180.15
210	0.00	35.81	-6.85	182.86
215	0.00	33.14	-6.01	186.11
220	0.00	30.22	-5.01	189.96
225	0.00	27.11	-3.83	194.49
230	0.00	23.83	-2.43	199.84
235	0.00	20.42	-0.75	204.61
240	0.00	16.89	1.31	212.70
245	0.00	13.28	3.92	223.69
250	0.00	9.59	7.46	239.87
255	0.00	6.33	11.96	322.36
260	0.00	6.11	12.35	435.28
265	0.00	9.18	7.93	242.12
270	0.00	13.46	3.77	223.04
275	0.00	18.11	0.55	209.67
280	0.00	22.90	-2.00	201.49
285	0.00	27.76	-4.09	193.50
290	0.00	32.66	-5.85	186.72
295	0.00	37.59	-7.38	180.83
300	0.00	42.53	-8.72	175.64
305	0.00	47.48	-9.91	171.00
310	0.00	52.44	-10.00	170.66
315	0.00	57.40	-10.00	170.66
320	0.00	62.37	-10.00	170.66
325	0.00	67.34	-10.00	170.66
330	0.00	72.31	-10.00	170.66
335	0.00	77.28	-10.00	170.66
340	0.00	82.26	-10.00	170.66
345	0.00	87.23	-10.00	170.66
350	0.00	92.21	-10.00	170.66
355	0.00	97.18	-10.00	170.66

## 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 KA275  
HAGERSTOWN, MARYLAND**

**MARCH 22, 2016**



March 16, 2016.

**Boeing Satellite Systems International, Inc.**

Attn: Juliet Speir  
Contracts Manager

Dear Ms. Speir,

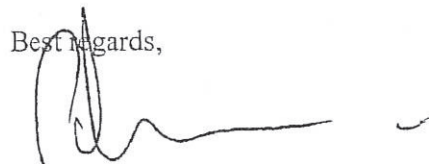
Reference is made to the Commercial Satellite Delivery Contract No. Contract No. BSS-SATMEX-12-001B by and between Boeing Satellite Systems International, Inc. (Boeing) and Eutelsat Latin America, S.A, (as successor of Satélites Mexicanos, S.A. de C.V.) ("Eutelsat") as amended.

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.