

April 8, 2016

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Request for Special Temporary Authority

Hagerstown, Maryland Earth Station KA258

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")<sup>1</sup> for 60 days, commencing May 28, 2016, to use its Hagerstown, Maryland Ku-band earth station—call sign KA258—to provide launch and early orbit phase ("LEOP") services for Intelsat 31; telemetry, tracking, and command ("TT&C") during in-orbit testing ("IOT") at 76.5° W.L; and TT&C during the drift of Intelsat 31 to its final location of 95.05° W.L.<sup>2</sup> Intelsat 30 is expected to be launched on May 28, 2016. The LEOP period is expected to last approximately 10 days; IOT and drift are expected to last approximately 20 days and 3 weeks, respectively.<sup>3</sup>

The proposed operations will be performed using the following frequencies: 13998.50 MHz, and 14006.0 MHz in the uplink (LHCP, H); and 11194.25 MHz, 11195.5 MHz, 11196.25 MHz, and 11196.75 MHz in the downlink (RHCP, V). The proposed operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path, the drift path, or are potentially affected by these operations at the IOT location.<sup>4</sup> All operators of potentially affected satellites will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

The 24x7 contact information for the Intelsat 31 mission is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary) (310) 525-5591 – West Coast Operations Center (back-up)

<sup>&</sup>lt;sup>1</sup> Intelsat has filed its STA request, an FCC Form 159, a \$195.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

<sup>&</sup>lt;sup>2</sup> See Policy Branch Information; Actions Taken, Report No. SAT-01052, File No. SAT-LOA-20140410-00038 (November 7, 2014) (Public Notice). At 95.05° W.L., Intelsat 31 will be co-located with Intelsat 30 (S2887) and Galaxy 3C (S2381).

<sup>&</sup>lt;sup>3</sup> Intelsat is seeking authority for 60 days to accommodate a possible launch delay.

<sup>&</sup>lt;sup>4</sup> Intelsat will handle the coordination.

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Request to speak with Harry Burnham or Kevin Bell.

In further support of this request, Intelsat hereby attaches Exhibit A, which contains technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility, or into Federal systems operating in the 13.75 -14.00 GHz band. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

Grant of this STA request will allow Intelsat to help launch and test the Intelsat 31 satellite. This, in turn, will help ensure continuity of service at the 95.05° W.L. orbital location and thereby promotes the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

Cynthia g. Frady

Cynthia J. Grady

Regulatory Counsel Intelsat Corporation

cc: Paul Blais