

April 13, 2016

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

Re: Request for Special Temporary Authority
Ellenwood, Georgia Earth Station E000048

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 60 days, commencing June 6, 2016, to use its Ellenwood, Georgia Ku-band earth station—call sign E000048—to provide telemetry, tracking, and command (“TT&C”) services to Intelsat 31 during in-orbit testing (“IOT”) at 76.5° W.L; and during the drift of Intelsat 31 to and at its final location of 95.05° W.L.² Intelsat 31 is expected to be launched on May 28, 2016. The IOT and drift are expected to last approximately twenty days and three weeks, respectively.³

The proposed operations will be performed using the following frequencies: 13998.50 MHz and 14006.00 MHz in the uplink (LHCP, H); and 11194.25 MHz, 11195.50 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 drift path or are potentially affected by these operations at the IOT location.⁴ The proposed TT&C operations at 95.05° W.L. will be consistent with Intelsat’s coordination agreements for the nominal 95° W.L. location. 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)

¹ 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”).

² 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).

³ Intelsat has a pending license modification application for E000048 to add Intelsat 31 as a point of communications at 95.05° W.L. See *Intelsat License Modification to License for Ellenwood, Georgia Earth Station, Call Sign E000048*, File No. SES-MFS-20160408-00325 (filed Apr. 8, 2016).

⁴ Intelsat will handle the coordination.

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(310) 525-5591 – West Coast Operations Center (back-up)

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 test, drift, and safely station-keep 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 J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais