

June 22, 2016

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

Re: Request for Extension of Special Temporary Authority  
Riverside, California Earth Station E060384

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days, beginning June 27, 2016, of the Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to use its Riverside, California Ku-band earth station—call sign E060384—to provide launch and early orbit phase (“LEOP”) services<sup>2</sup> for Intelsat 31; telemetry, tracking, and command (“TT&C”) during in-orbit testing (“IOT”) at 132.0° W.L.; and TT&C during the drift of Intelsat 31 to and at its final location of 95.05° W.L.<sup>3</sup> Due to an unexpected launch delay, Intelsat 31 was launched on June 9, 2016. The LEOP period is expected to last approximately 15 days; IOT and drift are expected to last approximately three and two weeks, respectively.

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> 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:

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<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>2</sup> See *Satellite Communications Services Information; Actions Taken*, Report No. SES-015751856, File No. SES-STA-20160503-00390 (June 1, 2016) (Public Notice).

<sup>3</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>4</sup> Intelsat will handle the coordination.

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

Request to speak with Harry Burnham or Kevin Bell.

In further support of this extension request, Intelsat incorporates by reference Exhibit A of its initial STA request 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 extension request will allow Intelsat to help launch and test the Intelsat 31 satellite. This, in turn, will help bring additional capacity to 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