

July 7, 2016

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

Re: Request for Special Temporary Authority
Fillmore, California Earth Station E4132
EXPEDITED TREATMENT REQUESTED

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing no later than close of business tomorrow, July 8, 2016, to use its Fillmore, California C-band earth station—call sign E4132—to perform de-orbit maneuvers for the non-geostationary (“NGSO”) Sirius FM-2 satellite (collectively with Sirius FM-1 and Sirius FM-3, call sign S2105).² Sirius FM-2 is currently being de-orbited and the de-orbit is expected to last approximately 30 days.³ Intelsat respectfully requests expedited treatment of this request which, as explained below, is necessitated due to a spacecraft anomaly.

The Sirius FM-2 operations will be performed in the following frequencies: 6422.5 MHz and 6424.5 MHz in the uplink (LHCP), and 4196.5 MHz and 4197 MHz in the downlink (LHCP). As Intelsat verbally informed the International Bureau staff on July 7, 2016, the addition of E4132 is needed to accommodate the slower than initially planned de-orbit of Sirius FM-2, which was necessitated by a spacecraft anomaly. The addition of a California-based TT&C earth station will facilitate communications and information analysis with FM-2 while the satellite transits the Pacific Ocean during the de-orbit.

To the extent necessary, Intelsat also requests a waiver of 47 C.F.R. § 25.120(a), which requires an STA request to “contain the full particulars of the proposed operation.” The Commission may grant a waiver

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 *Policy Branch Information; Actions Taken*, Report No. SAT-00664, DA 10-236, File No. SAT-MOD-20091119-00123 (Feb. 5, 2010) (Public Notice).

³ Satellite CD Radio, Inc., Application for Modification to Extend License and to De-Orbit the FM-1, FM-2 and FM-3 Satellites, File No. SAT-MOD-20091119-00123 (stamp grant Feb. 4, 2010) (approving Sirius XM’s post-mission disposal plan for the FM-2 satellite).

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for good cause shown.⁴ 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.⁵ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists to waive 47 C.F.R. § 25.120(a) because a recent anomaly on Sirius FM-2 necessitated slower de-orbit maneuvers to accomplish the previously approved post mission disposal plan. Given that the satellite needs coverage of this antenna immediately, Intelsat was unable to file this request at least three business days in advance of needing the authorization. Accordingly, “extraordinary reasons for the delay” justify waiver of the rule.

Intelsat will take all practical steps to ensure that the operations proposed herein do not cause harmful interference to existing terrestrial operations. Because E4132 has been licensed in the past for numerous STAs for various spacecraft with similar frequencies, including the recent LEOP of Intelsat-29e,⁶ Intelsat believes risk of interference is low. 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 permit an additional earth station, E4132, to perform TT&C for the Sirius FM-2 satellite post-anomaly and therefore help facilitate the safe transition of the satellite into its disposal orbit. As such, this request is in the public interest.

For these reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request.

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

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais

⁴ 47 C.F.R. §1.3.

⁵ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

⁶ *See Satellite Communications Services Information; Actions Taken*, Report No. SES-01818, File No. SES-STA-20151230-00975 (Jan. 27, 2016) (Public Notice).