

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:  
Request for 30-Day STA Using Fillmore, CA Earth Station E4132 for Sirius FM-2 Satellite

1. Applicant

<b>Name:</b>	Intelsat License LLC	<b>Phone Number:</b>	703-559-7848
<b>DBA Name:</b>		<b>Fax Number:</b>	703-559-8539
<b>Street:</b>	c/o Intelsat Corporation 7900 Tysons One Place	<b>E-Mail:</b>	susan.crandall@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>	Susan H. Crandall		

File # SES-STA-2016 0707-00633

Call Sign E4132 Grant Date 7/8/2016  
(or other identifier)

Term Dates

From 7/8/2016 To: 8/7/2016

Approved: Susan H. Crandall



Applicant: Intelsat License LLC.  
File No.: SES-STA-20160707-00633  
Call Sign: E4132



File # SES-STA-20160707-00633  
Call Sign E4132 Grant Date 7/8/2016  
(or other identifier)  
Term Dates  
From 7/8/2016 To: 8/7/2016  
Approved: Paul E. Blair

Intelsat License LLC. (Intelsat) is granted special temporary authority for 30 days, beginning July 8, 2016, to operate its fixed earth station in Fillmore, California to provide de-orbit TT&C support for the non-geostationary ("NGSO") Sirius FM-2 satellite (S2105) on the following center frequencies: 6422.5 MHz and 6424.5 MHz in the uplink, and 4196.5 MHz and 4197 MHz in the downlink.

1. In the event of any harmful interference as a result of operations under this grant of STA, Intelsat shall cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.
2. All operations shall be on an unprotected, non-interference basis to both government and non-government operations.
3. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat's own risk.
4. Grant of this authorization is without prejudice to any determination that the Commission may make regarding any pending or future Intelsat applications.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective immediately.

<b>2. Contact</b>			
<b>Name:</b>	Cynthia J. Grady	<b>Phone Number:</b>	703-559-6949
<b>Company:</b>	Intelsat Corporation	<b>Fax Number:</b>	703-559-8539
<b>Street:</b>	7900 Tysons One Place	<b>E-Mail:</b>	cynthia.grady@intelsat.com
<b>City:</b>	McLean	<b>State:</b>	VA
<b>Country:</b>	USA	<b>Zipcode:</b>	22102 -5972
<b>Attention:</b>		<b>Relationship:</b>	Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)			
3. Reference File Number or Submission ID			
4a. Is a fee submitted with this application?			
<input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).			
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee			
<input type="radio"/> Other (please explain):			
4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station			
5. Type Request			
<input type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other			
6. Requested Use Prior Date			
7. City/Fillmore			
8. Latitude (dd mm ss.s h) 34 24 22.0 N			

<p>9. State CA</p>	<p>10. Longitude (dd mm ss.s h) 118 53 34.0 W</p>
<p>11. Please supply any need attachments. Attachment 1: STA Request      Attachment 2: Attachment 3:</p>	
<p>12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)</p> <div style="border: 1px solid black; padding: 5px;"> <p>Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing immediately upon grant, to use its Fillmore, California C-band earth station, call sign E4132, to perform de-orbit maneuvers for the non-geostationary Sirius FM-2 satellite (collectively with Sirius FM-1 and Sirius FM-3, call sign S2105). Sirius FM-2</p> </div>	
<p>13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application"; for these purposes.</p> <p style="text-align: right;"> <input checked="" type="radio"/> Yes      <input type="radio"/> No </p>	
<p>14. Name of Person Signing Cynthia J. Grady</p>	<p>15. Title of Person Signing Regulatory Counsel, Intelsat Corporation</p>
<p style="text-align: center;">WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).</p>	

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## **12. Description**

Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing immediately upon grant, to use its Fillmore, California C-band earth station, call sign E4132, to perform de-orbit maneuvers for the non-geostationary Sirius FM-2 satellite (collectively with Sirius FM-1 and Sirius FM-3, call sign S2105). Sirius FM-2 is currently being de-orbited and the de-orbit is expected to last approximately 30 days.



July 7, 2016

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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”)<sup>1</sup> 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).<sup>2</sup> Sirius FM-2 is currently being de-orbited and the de-orbit is expected to last approximately 30 days.<sup>3</sup> 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

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

<sup>3</sup> 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.<sup>4</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>5</sup> 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,<sup>6</sup> 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

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<sup>4</sup> 47 C.F.R. §1.3.

<sup>5</sup> *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).

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