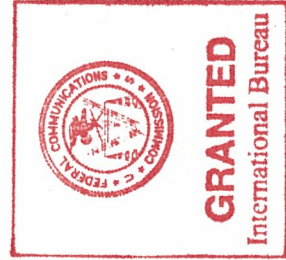


APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
30-Day STA Using Riverside, CA Earth Station E040125 to Provide LEOP Services for InSat-3DR Satellite

1. Applicant

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



File # SES-STA-20160801-00708
E040125
 Call Sign E040125 Grant Date 8-01-14
 (or other identifier)
 Term Dates 8-28-14 To: 9-27-14
 Approved: *[Signature]*

Applicant: Intelsat License LLC
File No.: SES-STA-20160801-00708
Call Sign: E040125
Special Temporary Authority



File # SES-STA-20160801-00708
Call Sign E040125 Grant Date 8-9-16
(or other identifier)
Term Dates
From: 8-28-16 To: 9-27-16
Approved: Paul E. Hoes

Intelsat License LLC is granted Special Temporary Authority, under the following conditions, for 30 days, beginning August 28, 2016, to operate its C-band earth station, Call Sign E040125, located in, Riverside, California, to provide launch and early orbit phase ("LEOP") services for the InSat-3DR satellite licensed by India, as it travels to its permanent orbital location 74° E.L. Communications will be on the following center frequencies: 6415.00 MHz and 6419.32 MHz (RHCP) in the (Earth-to-space), and 4190.976 MHz and 4196.928 MHz (CP) in the (space-to-Earth). InSat-3DR satellite is expected to be launched no earlier than August 28, 2016.

1. During the drift to the satellite's permanent orbital location at 74.0° E.L., Intelsat will coordinate with operators of co-frequency satellites in the drift path.
2. The LEOP operations must be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path. All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs, Currently the 24x7 contact information for the InSat-3DR LEOP mission is as follows: 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.
3. All operations under this grant of STA shall be on an unprotected and non-harmful interference basis. Intelsat's E040125 shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
4. In the event of any harmful interference under this grant of STA, Intelsat License, LLC, E040125 must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
5. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future Intelsat License, LLC applications.
6. Any action taken or expense incurred as a result of operations pursuant to this STA is solely 'at Intelsat License, LLC's risk.
7. 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.

2. Contact			
Name:	Cynthia J. Grady	Phone Number:	703-559-6949
Company:	Intelsat Corporation	Fax Number:	703-559-8539
Street:	7900 Tysons One Place	E-Mail:	cynthia.grady@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102 -5972
Attention:		Relationship:	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. CityNuevo			
			8. Latitude (dd mm ss.s h) 33 47 43.6 N

9. State CA	10. Longitude (dd mm ss.s h) 117 5 20.4 W
11. Please supply any need attachments. Attachment 1: STA Request Attachment 2: Exhibit A Attachment 3: Exhibit B	
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.) <div style="border: 1px solid black; padding: 5px;"> <p>Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing August 28, 2016, to use its Riverside, California C-band earth station, call sign E040125, to provide launch and early orbit phase services for the InSat-3DR satellite. InSat-3DR is expected to be launched August 28, 2016. The LEOP period is</p> </div>	
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. Yes <input checked="" type="radio"/> No <input type="radio"/>	
14. Name of Person Signing Cynthia J. Grady	15. Title of Person Signing Regulatory Counsel, Intelsat Corporation
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).	

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

12. Description

Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing August 28, 2016, to use its Riverside, California C-band earth station, call sign E040125, to provide launch and early orbit phase services for the InSat-3DR satellite. InSat-3DR is expected to be launched August 28, 2016. The LEOP period is expected to last approximately 10 days.



INTELSAT

Envision. Connect. Transform.

August 1, 2016

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

Re: Request for Special Temporary Authority
Riverside, California Earth Station E040125

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing August 28, 2016, to use its Riverside, California C-band earth station—call sign E040125—to provide launch and early orbit phase (“LEOP”) services for the InSat-3DR satellite. InSat-3DR is expected to be launched August 28, 2016.² The LEOP period is expected to last approximately 10 days.³

The InSat-3DR LEOP operations will be performed in the following frequency bands: 6415.00 MHz and 6419.32 MHz in the uplink (RHCP), and 4190.976 MHz and 4196.928 MHz in the downlink (CP). The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁴ All operators of satellites in that path 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 InSat-3DR LEOP mission is as follows:

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 request, Intelsat hereby attaches Exhibits A and B, which contain technical information that demonstrates that the operation of the earth station will be compatible with its

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 The permanent orbital location for InSat-3DR, which Intelsat understands is licensed by India, will be at 74.0° E.L. The in-orbit testing location will be 74.0° E.L.

³ Intelsat is seeking authority for 30 days to accommodate a possible launch delay.

⁴ Indian Space Research Organisation (“ISRO”), the manager of the InSat-3DR mission, will handle the coordination.

Ms. Marlene H. Dortch
August 1, 2016
Page 2

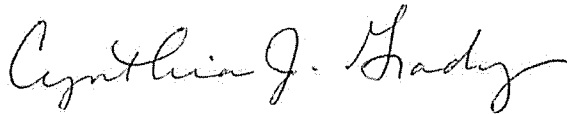
electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility, as well as a waiver request. Intelsat also notes that for purposes of the InSat-3DR LEOP mission, it is seeking to operate in the frequencies listed in the request at power levels not to exceed 24.5 dBW. The technical information submitted with this STA request reflects a power level as high as 34.0 dBW because Intelsat might operate at this level in the event an emergency necessitates the use of a higher power level in order to command the satellite. 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.

Finally, Intelsat clarifies that during the InSat-3DR LEOP mission, ISRO will serve as the mission manager. ISRO will build and send the commands to the Intelsat antenna, which will process and execute the commands. Telemetry received by Intelsat will be forwarded to ISRO. Intelsat will perform the ranging sessions by sending a tone to the spacecraft periodically. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

Grant of this STA request will allow Intelsat to help launch the InSat-3DR satellite. This, in turn, will result in the provision of a new weather satellite from the 74.0° E.L. orbital location 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

Exhibit A

PETITION FOR WAIVER OF SECTIONS 25.137 AND 25.114

Pursuant to Section 25.137 of the Federal Communications Commission's ("Commission" or "FCC") rules, earth station applicants "requesting authority to operate with a non-U.S. licensed space station *to serve the United States*" must demonstrate that effective competitive opportunities exist and must provide the same technical information required by Section 25.114 for U.S.-licensed space stations.¹ Intelsat License LLC ("Intelsat") herein seeks authority to provide launch and early orbit phase ("LEOP") services—not commercial services—to the United States, and thus believes that Section 25.137 does not apply.²

To the extent the Commission determines, however, that Intelsat's request for authority to provide LEOP services on a special temporary basis is a request to serve the United States with a non U.S.-licensed satellite, Intelsat respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission's rules.³ The Commission may grant a waiver for good cause shown.⁴ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁵ 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.⁶ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause exists for a waiver of both Section 25.137 and Section 25.114. With respect to Section 25.114, Intelsat seeks authority only to provide LEOP services for the InSat-3DR satellite. The information sought by Section 25.114 is not relevant to LEOP services. Moreover, Intelsat does not have—and would not easily be able to obtain—such information because Intelsat is not the operator of the InSat-3DR satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with the Indian Space Research Organisation ("ISRO"), the manufacturer of the InSat-3DR satellite, to conduct LEOP services for the satellite.

¹ 47 C.F.R. § 25.137 (emphasis added).

² See *EchoStar Satellite Operating Company Application for Special Temporary Authority Related to Moving the EchoStar 6 Satellite from the 77° W.L. Orbital Location to the 96.2° W.L. Orbital Location, and to Operate at the 96.2° W.L. Orbital Location*, DA 13-593, File No. SAT-STA-20130220-00023 (released Apr. 1, 2013) (noting that operating TT&C earth stations in the United States with a foreign-licensed satellite does not constitute "DBS service").

³ 47 C.F.R. §§ 25.137 and 25.114.

⁴ 47 C.F.R. §1.3.

⁵ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

⁶ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

The information that Intelsat is not including is not required to determine potential harmful interference. The Schedule S information for this satellite would pertain to the operation of the InSat-3DR satellite at its final orbital location. However, the present application for LEOP services involves communications *prior* to the satellite attaining its final location in the geostationary orbit. In other words, during the LEOP mission, the earth station will not be communicating with a satellite located in the geostationary orbit. Rather, it will be transmitting to a satellite traveling on its “transfer orbit” or “LEOP path,” which starts immediately following its separation from a launch vehicle, and ends when the satellite reaches its geostationary orbital location. Moreover, as with any STA, Intelsat will perform the LEOP services on a non-interference basis.

Because it is not relevant to the service for which Intelsat seeks authorization, and because obtaining the information would be a hardship, Intelsat seeks a waiver of all the information required by Section 25.114. Intelsat has provided in this STA request the required technical information that is relevant to the LEOP services for which Intelsat seeks authorization.

Good cause also exists to waive Section 25.137. Section 25.137 is designed to ensure that “U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services” in other countries. Here, there is no service being provided by the satellite; it is simply being placed in its orbital location after separating from the launch vehicle. Thus, the purpose of the information required by Section 25.137 is not implicated here. For example, Section 25.137(d) requires earth station applicants requesting authority to operate with a non-U.S.-licensed space station that is not in orbit and operating to post a bond.⁷ The underlying purpose in having to post a bond—*i.e.*, to prevent warehousing of orbital locations by operators seeking to serve the United States—would not be served by requiring Intelsat to post a bond in order to provide approximately ten days of LEOP services to the InSat-3DR satellite.

It is Intelsat’s understanding that InSat-3DR is licensed by India, which is a WTO-member country. It is also Intelsat’s understanding that at its permanent location of 74.0° E.L., InSat-3DR will not see the United States. Thus, the purposes of Section 25.137—to ensure that U.S. satellite operators enjoy “effective competitive opportunities” to serve foreign markets and to prevent warehousing of orbital locations serving the United States—will not be undermined by grant of this waiver request.

Finally, Intelsat notes that it expects to operate with the InSat-3DR satellite using its U.S. earth station for a period of approximately 10 days. Requiring Intelsat to obtain copious technical and legal information from an unrelated party, where there is no risk of harmful interference and the operations will cease after approximately 10 days, would pose undue hardship without serving underlying policy objectives. Given these particular facts, the waiver sought herein is plainly appropriate.

⁷ See 47 C.F.R. §25.137(d)(4).

Prepared By

COMSEARCH

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Prepared For

**Intelsat License LLC
Nuevo, California**

Temporary Transmit-Only Earth Station
Operation Dates: 08/28/2016 - 09/07/2016

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations. Verbal and written coordination was conducted with the below listed carriers on July 11, 2016.

Company

ABC Holding Company Inc.
AT&T Mobility Spectrum LLC - Southern CA
AirSites2000, LLC
Alltel Comm Southwest Holdings Inc.
Anaheim City, of
Arizona Public Service Company (APS)
Arizona, State Of
BNSF Railway Company
CCO SoCal I, LLC
California, State of
Calvary Chapel of Costa Mesa
Cellco Partnership - Southern California
City of Casa Grande
City of Los Angeles Dept Water & Power
City of Montebello
City of Yuma
Coachella Valley Water District
Coast Community College District
Commnet Four Corners, LLC
DM Ventures, Inc. dba Warp2Biz
DRS Technical Services
Entravision Holdings, LLC
Federal Communication Commission
Fisher Wireless Services, Inc.
Fresno MSA Limited Partnership
Gila River Cellular General Partnership
Glendale, City of
Global Telecom & Technology Americas, In
GovNET Licenses LLC
ION Media Los Angeles License, Inc.
KTLA, LLC
Kern Ed Telecom Consortium
Kern, County of
LDM Engineering
LOS ANGELES UNIFIED SCHOOL DISTRICT
Lightwave Broadband LLC
Los Angeles City Info Technology Agency
Los Angeles County Dept of Public Works
Los Angeles County FCC Licensing Section
Los Angeles County Metro Transit Auth

Los Angeles SMSA Ltd. Partnership
MHO Networks
MOBILE RELAY ASSOCIATES INC
Maricopa County Wireless Systems
Metropolitan Water Dist of So California
NRJ TV LA License Co, LLC
New Cingular Wireless PCS LLC - AZ
New Cingular Wireless PCS - Los Angeles
New Cingular Wireless PCS LLC - N CAL
New Cingular Wireless PCS LLC -San Diego
Nextel License Holdings 4 Inc.
Nextel of California Inc.
Norris, Samuel O
Northrop Grumman Systems Corp.
Olympic Wireless, LLC
Orange, County of, CA
Pacific Bell Tel Com dba AT&T California
Phoenix, City of
Pinal, County of
QUALCOMM INC.
Qwest Corporation
Regional 3Cs
Riverside, County of
San Bernardino County of California
San Diego Broadband
San Diego County Water Authority
San Diego Gas & Electric Company
San Diego, City of
San Diego, County of
Skyriver Communications
Southern California Edison Company
Southern California Gas Company
Southern California Regional Rail Auth.
Sprint Spectrum L.P.
Sprint Telephony PCS, L.P.
Station Venture Operations, LP
T-Mobile License LLC
TV MICROWAVES CO
Table Top Telephone Company
Telink Networks SW, LLC
Time Warner Cable Pacific West LLC
Tucson Electric Power Company
Turn Wireless, LLC
Ultimate Internet Access, Inc
Union Pacific Railroad Company
University of California, HPWREN
Vectus, Inc
Verizon California Inc.
Verizon Wireless (VAW) LLC (Southern CA)
Verizon Wireless (VAW) LLC-N CA/NV
Verizon Wireless(VAW) LLC-AZ/CO/NM/NV/UT
Western Technical Services
White, Fred K

There are no unresolved interference objections with the station contained in these applications.

The following section presents the data pertinent to frequency coordination of the earth station that was circulated to all carriers within its coordination contours.

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 <http://www.comsearch.com>

Date: 07/08/2016
Job Number: 160711COMSGE02

Administrative Information

Status ENGINEER PROPOSAL
Call Sign E040125
Licensee Code INTELS
Licensee Name Intelsat License LLC

Site Information

NUEVO, CA
Venue Name
Latitude (NAD 83) 33° 47' 43.6" N
Longitude (NAD 83) 117° 5' 20.4" W
Climate Zone A
Rain Zone 4
Ground Elevation (AMSL) 566.62 m / 1859.0 ft

Link Information

Satellite Type Geostationary
Mode TO - Transmit-Only
Modulation Analog and Digital
Satellite Arc 45° W to 170° West Longitude
Azimuth Range 100.2° to 247.2°
Corresponding Elevation Angles 6.2° / 22.0°
Antenna Centerline (AGL) 7.32 m / 24.0 ft

Antenna Information

Transmit - FCC32
Manufacturer TIW
Model 11 Meter
Gain / Diameter 55.5 dBi / 11.0 m
3-dB / 15-dB Beamwidth 0.29° / 0.54°

Max Available RF Power (dBW/4 kHz) 10.7
(dBW/MHz) 34.7

Maximum EIRP (dBW/4 kHz) 66.2
(dBW/MHz) 90.2
(dBW) 89.5

Interference Objectives: Long Term -154.0 dBW/4 kHz 20%
Short Term -131.0 dBW/4 kHz 0.0025%

Frequency Information

Transmit 6.1 GHz
Emission / Frequency Range (MHz) 850KFXD / 6415.0 - 6419.32

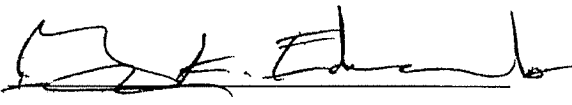
Max Great Circle Coordination Distance 515.7 km / 320.4 mi
Precipitation Scatter Contour Radius 381.6 km / 237.1 mi

Coordination Values	NUEVO, CA	
Licensee Name	Intelsat License LLC	
Latitude (NAD 83)	33° 47' 43.6" N	
Longitude (NAD 83)	117° 5' 20.4" W	
Ground Elevation (AMSL)	566.62 m / 1859.0 ft	
Antenna Centerline (AGL)	7.32 m / 24.0 ft	
Antenna Model	TIW 11 Meter	
Antenna Mode	Transmit 6.1 GHz	
Interference Objectives: Long Term	-154.0 dBW/4 kHz	20%
Short Term	-131.0 dBW/4 kHz	0.0025%
Max Available RF Power	10.7 (dBW/4 kHz)	

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 6.1 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	0.91	100.15	-10.00	172.39
5	2.23	95.18	-10.00	133.74
10	1.88	90.19	-10.00	140.02
15	2.42	85.20	-10.00	130.20
20	2.49	80.21	-10.00	128.82
25	2.56	75.22	-10.00	127.47
30	3.50	70.22	-10.00	110.23
35	3.34	65.23	-10.00	113.16
40	3.36	60.23	-10.00	112.81
45	3.28	55.24	-10.00	114.21
50	2.88	50.27	-10.00	121.63
55	2.50	45.31	-9.40	130.89
60	2.77	40.31	-8.14	130.54
65	3.44	35.29	-6.69	123.71
70	3.10	30.33	-5.05	134.68
75	3.19	25.36	-3.10	140.91
80	3.76	20.33	-0.70	140.20
85	3.33	15.45	2.28	163.29
90	3.39	10.56	6.41	185.04
95	2.51	6.34	11.94	232.12
100	2.99	3.18	19.45	515.71
105	3.63	5.38	13.72	217.20
110	3.84	9.29	7.80	182.70
115	3.70	13.36	3.86	163.23
120	3.87	17.17	1.13	146.35
125	3.84	21.02	-1.07	137.23
130	4.49	24.32	-2.65	122.77
135	3.88	28.30	-4.29	125.06
140	4.24	31.47	-5.45	115.37
145	4.11	34.76	-6.53	113.04
150	4.48	37.41	-7.32	105.07
155	4.67	39.84	-8.01	100.00
160	4.09	42.53	-8.72	105.16
165	4.55	43.90	-9.06	100.00
170	4.85	44.86	-9.30	100.00
175	5.79	44.68	-9.25	100.00
180	6.19	44.52	-9.21	100.00
185	6.91	43.57	-8.98	100.00

Certification

I hereby certify that I am the technically qualified person responsible for the preparation of the frequency coordination data contained in this report. I am familiar with Parts 101 and 25 of the FCC Rules and Regulations and I have either prepared or reviewed the frequency coordination data submitted with this report, and that it is complete and correct to the best of my knowledge and belief.

BY: 

Gary K. Edwards
Senior Manager
COMSEARCH
19700 Janelia Farm Boulevard
Ashburn, VA 20147

DATED: July 29, 2016