

August 24, 2016

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

> Re: Request for Special Temporary Authority Fillmore, California Earth Station E4132

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")<sup>1</sup> for 30 days, commencing October 4, 2016, to use its Fillmore, California C-band earth station—call sign E4132—to provide launch and early orbit phase ("LEOP") services for the GSAT-18 satellite. GSAT-18 is expected to be launched October 4, 2016.<sup>2</sup> The LEOP period is expected to last approximately 10 days.<sup>3</sup>

The GSAT-18 LEOP operations will be performed in the following frequency bands: 6415.00 MHz and 6421.48 MHz in the uplink (RHCP), and 4187.52 MHz and 4188.768 MHz in the downlink (LHCP). The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.<sup>4</sup> 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 GSAT-18 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.

<sup>&</sup>lt;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").

 $<sup>^{2}</sup>$  The permanent orbital location for GSAT-18, which Intelsat understands is licensed by India, will be 74.0° E.L. The in-orbit testing location will be 48.0° E.L.

<sup>&</sup>lt;sup>3</sup> Intelsat is seeking authority for 30 days to accommodate a possible launch delay.

<sup>&</sup>lt;sup>4</sup> Indian Space Research Organisation ("ISRO"), the manager of the GSAT-18 mission, will handle the coordination.

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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 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 GSAT-18 LEOP mission, it is seeking to operate in the frequencies listed in the request at power levels not to exceed 34.0 dBW. 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 GSAT-18 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 GSAT-18 satellite. This, in turn, will result in the provision of a replacement satellite to ensure service continuity at the 74.0° E.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