

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Request for STA to Utilize a 9.2m Ka-band Antenna at Intelsat's Riverside Teleport

1. Applicant

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

File # SES-STA-20160829-00750

Call Sign 9-19-16
(or other identifier) **Grant Date**

Term Dates
From: 10-4-16 To: 11-3-16

Approved: *Susan H. Crandall*



Applicant: Intelsat License LLC
File No.: SES-STA-20160829-00750
Call Sign: None
Special Temporary Authority



File # SES-STA-20160829-00750
Call Sign _____ Grant Date 9-14-16
(or other identifier)
Term Dates
From: 10-4-16 To: 11-3-16
Approved: [Signature]

Intelsat License, LLC (“Intelsat”) is granted a special temporary authority (“STA”), under the following conditions, for 30 days, beginning October 04, 2016, to utilize a 9.2 m Ka-band antenna located at its Riverside, California teleport, to provide launch and early orbit phase (LEOP) services for NBNC0-1B satellite to its in-orbit test location at 144.8° E.L. NBNC0-1B satellite licensed by Australia and the satellite is expected to be launched no earlier than October 04, 2016.

1. Uplink (Earth-to-space) frequencies to NBNC0-1B satellite are 29505.50 MHz and 29507.50 MHz (LHCP) center frequencies within coordinated emission and power limits.
2. Downlink (space-to-Earth) frequencies from NBNC0-1B satellite are 19345 MHz and 19347 MHz (LHCP) center frequencies.
3. 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 NBNC0-1B satellite LEOP mission is as follows: Ph.: (703) 559-7701 –East Coast Operations Center (primary); (310) 525-5591- West Coast Operations Center (back-up). Requests to speak with Harry Burnham or Kevin Bell.
4. The 17.8 - 20.2 GHz band is shared with U.S. Government space stations and associated earth stations in the fixed Satellite Services. Services within the United States over the satellite network of which this is a cooperating earth station are subject to coordination under US334 and operation of the earth station(s) authorized herein will be subject to any technical constraints resulting from this coordination. See 47 C.F.R. Section 2.106, Footnote US334.
5. All operations under this grant of STA shall be on an unprotected and non-harmful interference basis. Intelsat’s shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
6. 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.
7. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat License LLC’s risk.
8. 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?

If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

Governmental Entity Noncommercial educational licensee

Other (please explain):

4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station

5. Type Request

Use Prior to Grant Change Station Location Other

6. Requested Use Prior Date

7. CityNuevo 8. Latitude (dd mm ss.s h) 33 47 42.7 N

9. State CA	10. Longitude (dd mm ss.s h) 117 5 22.5 W
11. Please supply any need attachments. Attachment 1: STA Request Attachment 2: Exhibit A Attachment 3:	
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.) Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing October 4, 2016, to utilize a 9.2m Ka-band antenna located at its Riverside, California teleport to provide launch and early orbit phase services for the NBNCo-1B (also known as Sky Muster 2) satellite. NBNCo-1B is expected to be launched on October 4,	
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"; 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).	

12. Description

Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing October 4, 2016, to utilize a 9.2m Ka-band antenna located at its Riverside, California teleport to provide launch and early orbit phase services for the NBnCo-1B (also known as Sky Muster 2) satellite. NBnCo-1B is expected to be launched on October 4, 2016.

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 NBNC0-1B 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 NBNC0-1B satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with SSL, the manufacturer of the NBNC0-1B 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.

August 29, 2016

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

Re: Request for Special Temporary Authority
9.2m Ka-band Antenna, Riverside, California

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing October 4, 2016, to utilize a 9.2m Ka-band antenna located at its Riverside, California teleport to provide launch and early orbit phase (“LEOP”) services for the NBNC0-1B (also known as Sky Muster 2) satellite. NBNC0-1B is expected to be launched on October 4, 2016.² The LEOP period is expected to last approximately 10 days.³

The NBNC0-1B LEOP operations will be performed in the following frequency bands: 29505.5 MHz and 29507.5 MHz (LHCP) in the uplink, and 19345.0 MHz and 19347.0 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.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 NBNC0-1B 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 Exhibit A, a waiver request.

¹ Intelsat has filed its STA request, an FCC Form 159, a \$200.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

² The in-orbit testing and the permanent orbital location of NBNC0-1B, which Intelsat understands is licensed by Australia, will be 144.8° E.L.

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

⁴ SSL, the manager of the NBN-1B LEOP mission, will handle the coordination.

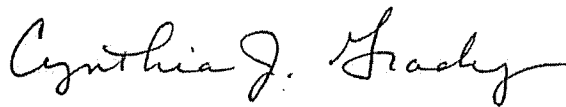
Ms. Marlene H. Dortch
August 29, 2016
Page 2

Finally, Intelsat clarifies that during the NBNC0-1B mission, SSL will serve as the mission manager. SSL 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 SSL. 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 NBNC0-1B satellite. This, in turn, will help provide broadband services at the 144.8° 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