

October 17, 2016

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

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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of the Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to use its Riverside, California C-band earth station—call sign E040125—to provide launch and early orbit phase (“LEOP”) services for Intelsat 33e.<sup>2</sup> Intelsat 33e was launched on August 24, 2016.<sup>3</sup> Due to a malfunction of the satellite’s main thruster the LEOP period is expected to take approximately three months.

The Intelsat 33e operations will continue to be performed using the following frequencies: 6722.00 MHz, 6424.5 MHz, 5850.5 MHz, and 5853.0 MHz in the uplink (LHCP/V); and 4197.25 MHz, 4197.75 MHz, 4198.25 MHz, and 4198.75 MHz in the downlink (LHCP/V). 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 Intelsat 33e mission is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary)  
(310) 525-5591 – West Coast Operations Center (back-up)

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<sup>1</sup> 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”).

<sup>2</sup> See *Satellite Communications Services information; Actions Taken*, Report No. SES-01890, File No. SES-STA-20160916-00791 (Sept. 28, 2016) (Public Notice); *Satellite Communications Services information; Actions Taken*, Report No. SES-01875, File No. SES-STA-20160801-00709 (Aug. 10, 2016) (Public Notice).

<sup>3</sup> The permanent orbital location for Intelsat 33e will be at 60.0° E.L. See *Policy Branch Information; Actions Taken*, Report No. SAT-01139, File No. SAT-LOA-20150327-00016 (Feb. 26, 2016) (Public Notice). The in-orbit testing location will be 59.55° E.L. See *Intelsat License LLC Request for Special Temporary Authority to Conduct In-Orbit Testing of Intelsat 33e; Call Sign S2939*, File No. SAT-STA-20160722-00069 (filed July 22, 2016).

<sup>4</sup> Intelsat will handle the coordination.

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Request to speak with Harry Burnham or Kevin Bell.

In further support of this further extension request, Intelsat incorporates by reference Exhibit A of its initial STA request, which contains 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. Intelsat also notes that for purposes of the Intelsat 33e 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.

Grant of this STA further extension request will allow Intelsat to continue safely orbit raising the Intelsat 33e satellite. This, in turn, will help provide additional capacity to customers at the 60.0° 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,

A handwritten signature in blue ink, appearing to read "Cynthia J. Grady". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais