

December 15, 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 Special Temporary Authority (“STA”)¹ 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 the Eutelsat-117WB (a.k.a. Satmex-9) satellite.² Eutelsat-117WB was launched on June 15, 2016.³ The LEOP period is expected to last approximately 205 days.⁴

The Eutelsat-117WB LEOP operations will continue to be performed in the following frequency bands: 6421.30 MHz and 6423.30 MHz in the uplink (LHCP), and 4198.2 MHz and 4199.8 MHz in the downlink (LHCP). The LEOP operations are being coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁵ 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 Eutelsat-117WB LEOP mission is as follows:

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

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 See *Satellite Communications Services Information; Actions Taken*, Report No. SES-01908, File No. SES-STA-20161115-00891 (Nov. 30, 2016) (Public Notice); *Satellite Communications Services Information; Actions Taken*, Report No. SES-01856, File No. SES-STA-20160325-00281 (June 1, 2016) (Public Notice).

³ The permanent orbital location and the in-orbit testing location for Eutelsat-117WB will be 117° W.L. Intelsat incorporates by reference Exhibit C, a letter regarding the satellite’s registration under the Convention on Registration of Objects Launched in Outer Space.

⁴ Intelsat is an additional 30 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite.

⁵ 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 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 Eutelsat-117WB LEOP mission, it is seeking to operate in the frequencies listed in the request at power levels not to exceed 26 dBW, except in case of emergency. 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 Eutelsat-117WB LEOP mission, Boeing will continue to serve as the mission manager. Boeing 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 Boeing. 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 further extension request will allow Intelsat to help launch the Eutelsat-117WB satellite. This, in turn, will result in the provision of video and data applications in Mexico, Latin America and the Caribbean from the 117° W.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,

/s/ Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais