

March 15, 2017

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”)<sup>1</sup> for 30 days, commencing April 28, 2017, to use its Riverside, California C-band earth station—call sign E040125—to provide launch and early orbit phase (“LEOP”) services for the GSAT-19 satellite.<sup>2</sup> GSAT-19 is expected to be launched on April 28, 2017.<sup>3</sup> The LEOP period is expected to last approximately 10 days.<sup>4</sup>

The GSAT-19 LEOP operations will be performed at the following frequencies: 6410.896 MHz and 6412.912 MHz in the uplink (RHCP), and 4186.848 MHz and 4190.976 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>5</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-19 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.

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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> Intelsat is also concurrently seeking an STA for E040125 to support the LEOP of GSAT-19.

<sup>3</sup> The in-orbit testing and final location for GSAT-19, which Intelsat understands is licensed by India, will be at 45.0° E.L.

<sup>4</sup> Intelsat is seeking authority for 30 days to accommodate a possible launch delay.

<sup>5</sup> Indian Space Research Organisation (“ISRO”), the manager of the GSAT-19 mission, will handle the coordination.

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In further support of this request, Intelsat herewith 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. 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-19 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-19 satellite 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