March 21, 2017

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

Re: Request for Special Temporary Authority
Hagerstown, Maryland Earth Station E140121

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")[1] for 30 days, commencing April 4, 2017, to use its Hagerstown, Maryland Ku-band earth station—call sign E140121—to provide launch and early orbit phase ("LEOP") services for the SES-15 satellite. SES-15 is expected to be launched on April 4, 2017.[2] Intelsat expects the LEOP period to last approximately 180 days.[3]

The SES-15 LEOP operations will be performed at the following frequencies: 13999.0 MHz, 14001.0 MHz, 14499.0 MHz, and 14501.0 MHz (V, H, or LHCP) in the uplink; and 10700.5 MHz and 12199.5 MHz (V, H, or LHCP) in the downlink. 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 SES-15 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.

[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 location for SES-15, which Intelsat understands is licensed by Luxemburg, will be at 136° W.L. The final location of SES-15 will be at 129° W.L.

[3] Intelsat has a pending application for 180 days to accommodate the longer orbit-raising time period required for an electric propulsion satellite. *See Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-01938, File No. SES-STA-20170213-00158 (Mar. 15, 2017) (Public Notice).

[4] Boeing, the manager of the SES-15 LEOP mission, will handle the coordination.

In further support of this request, Intelsat herewith attaches Exhibits A and B, which contain a 13 GHz report and 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 SES-15 LEOP mission, Boeing will 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 request will allow Intelsat to help launch the SES-15 satellite. This, in turn, will help provide additional capacity from the 129° 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,

Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais