

September 29, 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 E060384
Expedited Treatment Requested

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing October 9, 2017, to use its Riverside, California Ku-band earth station—call sign E060384—to provide telemetry, tracking, and command (“TT&C”) during in-orbit testing (“IOT”) at 176° E.L. for the Eutelsat 172B satellite. Eutelsat 172B was launched on June 1, 2017.² Intelsat expects the IOT period to last approximately 30 days. Intelsat is requesting expedited treatment due to unexpected antenna conflicts caused by numerous overlapping Ku-band satellite launch support missions.

The Eutelsat 172B LEOP and TT&C operations will be performed at the following frequencies: 13750.6 MHz, 13999.5 MHz, 14499.8 MHz, 13753.6 MHz, 14002.5 MHz, and 14496.8 MHz (CP) in the uplink; and 11200.6 MHz and 12250.1 MHz (CP) in the downlink. The TT&C operations will be coordinated with all potentially affected operators of satellites that use the same frequency bands.³ All potentially affected operators 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 172B 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 final location of Eutelsat 172B, which Intelsat understands is licensed by France, will be 172° E.L.

³ Airbus, the manager of the Eutelsat 172B LEOP mission, will handle the coordination.

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In further support of this request, Intelsat herewith attaches Exhibits A and B, which contain a 13 GHz report and a waiver request.⁴ 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 172B IOT mission, Airbus will serve as the mission manager. Airbus 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 Airbus. 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 safely station-keep the Eutelsat 172B satellite during IOT. This, in turn, will help provide additional capacity from the 172° 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,

/s/ Cynthia J. Grady

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais
Anthony Asongwed

⁴ As reflected in Exhibit A, Intelsat will limit the transmit power to 82 dBW in order to comply with our coordination requirements with the Navy radars.