

December 18, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Request for Special Temporary Authority  
Riverside, California Earth Station E170039

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 30 days, commencing January 25, 2018, to use its Riverside, California earth station—call sign E170039—to provide launch and early orbit phase (“LEOP”) services for the Al Yah 3 satellite. Al Yah 3 is expected to launch on January 25, 2018.<sup>2</sup> Intelsat expects the LEOP period to last approximately 30 days.

The Al Yah 3 LEOP operations will be performed in the following frequencies: 29997.5 MHz and 29999.5 MHz (RHCP) in the uplink, and 20198.5 and 20199.5 MHz (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.<sup>3</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 Al Yah 3 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.

In further support of this request, Intelsat herewith attaches Exhibit A, which requests waiver of Sections 25.137 and 25.114 of the Commission’s rules. In the extremely unlikely event that harmful interference should occur due to transmission to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

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<sup>1</sup> Intelsat has filed its STA request, FCC Form 159, a \$200.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

<sup>2</sup> The in-orbit testing and the permanent orbital location of Al Yah 3, which Intelsat understands is licensed by the United Arab Emirates, will be 20.0° W.L.

<sup>3</sup> Orbital ATK, the manager of the Al Yah 3 LEOP mission, will handle the coordination.

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Finally, Intelsat clarifies that during the mission, Orbital ATK will serve as the mission manager. Orbital ATK 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 Orbital ATK. 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 AL Yah 3 satellite. This, in turn, will help provide services at the 20.0° W.L. orbital location and thereby promotes the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-7848.

Respectfully submitted,

/s/ Susan H. Crandall  
Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

cc: Paul Blais