Approved by OMB
3060–0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATIONEnter a description of this application to identify it on the main menu:
Request for Special Temporary Authority to Use Hagerstown, MD Earth Station E000296 to Provide LEOP Services for Bangabandhu–1 Satellite

1. Applicant

Name:	Intelsat License LLC	**Phone Number:**	703–559–7848
DBA Name:		**Fax Number:**	703–559–8539
Street:	c/o Intelsat Corporation	**E–Mail:**	susan.crandall@intelsat.com
	7900 Tysons One Place		
City:	McLean	**State:**	VA
Country:	USA	**Zipcode:**	22102 –5972
Attention:	Susan H. Crandall		

GRANTED
International Bureau

File # SES-STA-20180228-00171
E000296
Call Sign _____ Grant Date 4-5-18
(or other identifier)
Term Dates
From: 4-5-18 To: 5-5-18
Approved: [signature]

Applicant: Intelsat License LLC
Call Sign: E000296
File No.: SES-STA-20180228-00171
Special Temporary Authority (STA)

Intelsat License LLC is granted to operate under STA for 30 days, beginning April 5, 2018, to use its C-band fixed earth station located 39° 35'54.0" N/ 077° 45' 35.0" W in Hagerstown, Maryland to provide launch and early orbit phase (LEOP) services for the Bangabandhu-1 satellite at its permanent orbital location 119.1° E. The satellite is expected to be launched on April 5, 2018. Operations will be under the following conditions:

1. Uplink to Bangabandhu-1 @ 119.1° E on 5850 MHz and 6425 MHz (LHCP) frequencies with coordinated 850KFXD emission and coordinated power limits.

2. Downlink from Bangabandhu-1 @ 119.1° E on 3703.0 MHz and 4199.8 MHz (CP) frequencies.

3. The LEOP operations must be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path. 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. Currently the 24x7 contact information for the Bangabandhu-1 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.

4. All operations shall be on an unprotected and non-harmful interference basis, Intelsat License LLC, E000296, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference and must inform the Commission, in writing, immediately of such an event.

5. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending or future Intelsat License LLC applications.

6. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat License LLC's risk.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective upon release.

GRANTED
International Bureau

File # SES-STA-20180228-00171
Call Sign E000296 Grant Date 4-5-18
(or other identifier)
Term Dates
From: 4-5-18 To: 5-5-18
Approved:

Summary of Ext-C band Technical Information
For Coordination with NTIA/FAS and WTB

Applicant: Intelsat License LLC
Call Sign: E000296
File No.: SES-STA-20180228-00171

Purpose of operation: Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days to use its C-band earth station, Call Sign E000296, located in Hagerstown, Maryland to provide launch and early orbit phase ("LEOP") services for the Bangabandhu-1 ("BS-1") satellite at the 119.1° E orbital location. The BS-1 satellite is licensed by the Bangladesh administration, and is expected to launch on April 5, 2018.

Start Date: April 5, 2018 **End Date: May 5, 2018**

Site Location: Hagerstown, Maryland

Latitude: 39 deg 35' 54.0" N (NAD-83)
Longitude: 077 deg 45' 35.0" W (NAD-83)

Transmit frequency: 5850.0 MHz, 6425.0 MHz
Receive frequency: 3703.0 MHz, 4199.8MHz

Polarization: LHCP –uplink
CP- downlink

Antenna Size in meter: 9 m, Vertex model KPC

Antenna Gain Transmit: 53.5 dBi @ 6.1 GHz

Frequency Band (MHz)	Emissions	eirp (dBW)	eirp density (dBW/4kHz)
5850 MHz	850KFXD	86.47	63.2
6425 MHz	850KFXD	86.47	63.2

Satellites: Bangabandhu-1@ 119.1° W

2. Contact

Name:	Susan H. Crandall	**Phone Number:**	703−559−7848
Company:	Intelsat Corporation	**Fax Number:**	703−559−8539
Street:	7900 Tysons One Place	E−Mail:	susan.crandall@intelsat.com
City:	McLean	**State:**	VA
Country:	USA	**Zipcode:**	22102 −5972
Attention:		**Relationship:**	Legal Counsel

(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)
3. Reference File Number or Submission ID

4a. Is a fee submitted with this application?
◉ If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R.Section 1.1114).
○ Governmental Entity ○ Noncommercial educational licensee
○ Other(please explain):

4b. Fee Classification CGX − Fixed Satellite Transmit/Receive Earth Station

5. Type Request

○ Use Prior to Grant ○ Change Station Location ◉ Other

6. Requested Use Prior Date	
7. CityHagerstown	8. Latitude (dd mm ss.s h) 39 35 54.0 N

9. State MD	10. Longitude (dd mm ss.s h) 77 45 35.0 W

11. Please supply any need attachments.

Attachment 1: STA Request Attachment 2: Exhibit A Attachment 3: Exhibit B

12. Description. (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing April 5, 2018, to use its Hagerstown, Maryland C-band earth station, call sign E000296, to provide launch and early orbit phase services for the Bangabandhu-1 satellite. BS-1 is expected to launch on April 5, 2018. Intelsat expects the LEOP period to last

13. By checking Yes, the undersigned certifies that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti–Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.

◉ Yes ○ No

14. Name of Person Signing Susan H. Crandall	15. Title of Person Signing Assoc. General Counsel, Intelsat Corporation

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104–13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

12. Description

Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing April 5, 2018, to use its Hagerstown, Maryland C-band earth station, call sign E000296, to provide launch and early orbit phase services for the Bangabandhu-1 satellite. BS-1 is expected to launch on April 5, 2018. Intelsat expects the LEOP period to last approximately 30 days.

INTELSAT
Envision. Connect. Transform.

February 28, 2018

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

Re: Request for Special Temporary Authority
Hagerstown, Maryland Earth Station E000296

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")[1] for 30 days, commencing April 5, 2018, to use its Hagerstown, Maryland C-band earth station—call sign E000296—to provide launch and early orbit phase ("LEOP") services for the Bangabandhu-1 ("BS-1") satellite. BS-1 is expected to launch on April 5, 2018.[2] Intelsat expects the LEOP period to last approximately 30 days.

The BS-1 LEOP operations will be performed at the following center frequencies: 5850.0 MHz and 6425.0 MHz (LHCP) in the uplink, and 3703.0 MHz and 4199.8 MHz (CP) 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.[3] 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 BS-1 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 Exhibits A and B, which contain a coordination report and waiver requests. 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.

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1 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").

2 The in-orbit testing and final orbital location for BS-1, which Intelsat understands is licensed by Bangladesh, will be 119.1° E.L.

3 Thales Alenia Space, the manager of the BS-1 mission, will handle the coordination.

Finally, Intelsat clarifies that during the BS-1 LEOP mission, Thales Alenia Space ("Thales") will serve as the mission manager. Thales 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 Thales. 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 BS-1 satellite. This will help provide services at the 119.1° E.L. 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

Exhibit A

Prepared By

COMSEARCH

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 http://www.comsearch.com

Prepared For

Intelsat License LLC
Hagerstown, Maryland
Temporary Transmit-Only Earth Station
Operation Dates: 03/27/2018 - 04/26/2018

Pursuant to Part 25.203(c) of the FCC Rules and Regulations, the satellite earth station proposed in this application was coordinated by Comsearch using computer techniques and in accordance with Part 25 of the FCC Rules and Regulations. Verbal and written coordination was conducted with the below listed carriers on January 22, 2018.

Company

AB Services LLC
AT&T Corp.
AT&T Wireless Services 3 LLC - PA
Access MLP Operating LLC
Adams County Department of Emergency Svc
Affiniti PA, LLC
Albemarle, County of, Virginia
Allentown SMSA Limited Partnership
Alltel Communications LLC - Western PA
Alltel Communications LLC-E OH WV
American Electric Power Service Corp
Appalachia Engineering Services
Appalachian Power Company
Aratika LLC
Argos Engineering, LLC
Atlantic Broadband (Penn), LLC
Atlantic City Electric Company
Atlantic, County of
Baltimore County of Maryland
Baltimore Gas and Electric Company
Beaver Springs Faith Baptist Church, Inc
Bedford County of
Believe Wireless, LLC
Berks County Department of Emergency Ser
Blair County 911
Blue Ridge Carriers
Blueline Communications
Bucks County Dept. of Emergency Comm
CBS Radio of Maryland, LLC
CNG Transmission Corporation
Calvert, County of
Cambria, County of
Capital Communications of America
Caroline County, VA
Carroll, County of
Cellco Partnership - Bridgeville, PA/WV

Cellco Partnership - Southern Virginia
Cellco Partnership- PA Region
Cellco Partnership-WDC/Baltimore
Cellco Prtnrshp - Phil. Tri-State Rgn
Centre Communications Inc.
Charles, County of
Chester, County of
Chesterfield, County of
City of Fredericksburg
Citynet
Clearfield, County of
Clinton, County of
Columbia Gas Transmission, LLC
Columbia, County
Commonwealth of Pennsylvania
Commonwealth of Pennsylvania-Radio Proj.
Comprehensive Wireless LLC
Conterra Ultra Broadband, LLC
Coralinks
County of Augusta
County of Burlington, Public Safety Cntr
County of Camden
County of Centre
County of Culpeper
County of Fayette
County of Frederick
County of King William, Virginia
County of Lycoming
County of York
DSRC Networks
Dauphin County Emergency Management
Delaware County (PA) Emergency Services
Delaware Division of Communications
Delmarva Broadcasting Company
Delmarva Power and Light Company
Direct Broadcast Services, Inc.
Dominion Energy Transmission, Inc.
ECW Wireless, LLC
Eastern MLG LLC
Electric Railroad, LLC
Enoch Pratt Free Library
Essex, County of
Exelon Generation Company, LLC
FELHC, Inc.
Federal Communication Commission
Frederick County
Fulton County of (PA)
Fundamental Broadcasting LLC
GSB Broadcasting LLC
GTT America LLC
Garden State Transmissions
Getwireless.Net
Gloucester, County of
Goochland County
Goochland, County of
Greene, County of (PA)

Hanover, County of
Hardy Cellular Telephone Company
Hardy County OEM/E911
Harrisonburg-Rockingham ECC
Henrico County
High Voltage Communications LLC (CFN)
Huntingdon County, Pa
Huntingdon, County of
Indiana, County of
Jackson County West Virginia
Jefferson County of Pennsylvania
Jefferson Microwave, LLC
Juniata County Emergency Services
Kentucky Power Company
King and Queen County
Kryptick Technologies
Lancaster County-Wide Communications
Limitless Mobile, LLC
Loudoun, County of
MGW Networks, LLC
Maryland Public Broadcasting Commission
Maryland State Highway Administration
Maryland, State of - Dept.of Info & Tech
McKean, County of
Mifflin County
Montgomery County Of
Montgomery, County of
National Tower Company II, LLC
National Tower Company LLC
New Cingular Wireless PCS LLC - NJ
New Cingular Wireless PCS - Maryland
New Cingular Wireless PCS LLC - DC
New Cingular Wireless PCS LLC - Ohio
New Cingular Wireless PCS LLC - VA
New Cingular Wireless PCS LLC - WV,NC,SC
New Cingular Wireless PCS LLC-DE/NH/RI
New Cingular Wireless PCS, LLC - PA
New Jersey Turnpike Authority-Pkwy Div
New Jersey, State of -NJ Transit
New Line Networks, LLC
Norfolk Southern Railway
Northumberland County DPS/911
Ohio Valley Electric Company
PSEG Services Corporation
Peco Energy Company
Pennsylvania Turnpike Commission
Peoples Natural Gas Company LLC
Pepco Holdings Inc.
Perry, County of
Pittsburgh SMSA Limited Partnership
Preston County Office of Emergency Manag
Prince George's County
Prince William, County of
Radio One Inc
Rappahannock Electric Cooperative
Richmond, City of

Rockbridge Reg. Pub Safety Comm Ctr
Rural Broadband Network Services LLC
SW Networks
Shenandoah Personal Communications, LLC
Shenandoah Valley Electric Cooperative
Somerset, County of
South Central Task Force (SCTFNET)
Southern Maryland Electric Cooperative I
Spotsylvania, County of
Sprintcom, Inc
St. Mary's County of (MD)
Stafford, County of
State of Maryland, MIEMSS
Sullivan, County of
T-Mobile License LLC
Texas Eastern Communications, LLC
The Voice Radio, LLC
Thought Transmissions, LLC
Torellco LLC
Transcontinental Gas Pipeline Corp.
US Cellular Operating Company, LLC (WI)
USCOC of Cumberland, Inc.
USCOC of Virginia RSA #3, Inc.
USOC of Pennsylvania RSA No 10 B2 Inc.
Uniti Fiber PEG, LLC
Ursa Navigation Solutions, Inc.
Verizon Maryland, Inc.
Verizon Wireless (VAW) LLC - Delaware/NJ
Verizon Wireless (VAW) LLC - Maryland
Verizon Wireless (VAW) LLC - W/B/V Mkts
Verizon Wireless (VAW) LLC-Pennsylvania
Verizon Wireless VAW LLC - West Virginia
Verizon Wireless VAW LLC-Southern VA
Virginia RSA 5 Limited Partnership
Virginia Broadband, LLC
Virginia Department of State Police
Virginia Electric & Power Company
WV DHHR BPH, Office of Ems, Com. Div.
Warrenton Fauquier Joint Communications
Washington Gas Light Company
Washington Suburban Sanitary Commission
Washington, County of
Webline Holdings LLC
West Virginia Educational Broadcasting
Westmoreland, County of
Wheeling Power Company
Wicomico County
Wireless Internetwork LLC
World Class Wireless, LLC
iSignal
xWave Engineering LLC

There are no unresolved interference objections with the station contained in these applications.

The following section presents the data pertinent to frequency coordination of the earth station that was circulated to all carriers within its coordination contours.

COMSEARCH

Earth Station Data Sheet

19700 Janelia Farm Boulevard, Ashburn, VA 20147
(703)726-5500 http://www.comsearch.com

Date:	02/22/2018
Job Number:	180122COMSGE09

Administrative Information

Status	TEMPORARY (Operation from 03/27/2018 to 04/26/2018)
Call Sign	E000296
Licensee Code	INTELS
Licensee Name	Intelsat License LLC

Site Information — HAGERSTOWN, MD

Venue Name	
Latitude (NAD 83)	39° 35' 54.0" N
Longitude (NAD 83)	77° 45' 35.0" W
Climate Zone	A
Rain Zone	2
Ground Elevation (AMSL)	173.74 m / 570.0 ft

Link Information

Satellite Type	Geostationary
Mode	TO - Transmit-Only
Modulation	Digital
Satellite Arc	6° W to 149° West Longitude
Azimuth Range	101.9° to 257.8°
Corresponding Elevation Angles	5.3° / 5.7°
Antenna Centerline (AGL)	5.79 m / 19.0 ft

Antenna Information — Transmit - FCC32

Manufacturer		Vertex
Model		9 KPC
Gain / Diameter		53.5 dBi / 9.0 m
3-dB / 15-dB Beamwidth		0.36° / 0.67°
Max Available RF Power	(dBW/4 kHz)	9.7
	(dBW/MHz)	33.7
Maximum EIRP	(dBW/4 kHz)	63.2
	(dBW/MHz)	87.2
Interference Objectives:	Long Term	-154.0 dBW/4 kHz 20%
	Short Term	-131.0 dBW/4 kHz 0.0025%

Frequency Information — Transmit 6.1 GHz

Emission / Frequency Range (MHz)	850KFXD / 5850.0 850KFXD / 6425.0
Max Great Circle Coordination Distance	536.7 km / 333.4 mi
Precipitation Scatter Contour Radius	551.9 km / 342.9 mi

Coordination Values	**HAGERSTOWN, MD**
Licensee Name	Intelsat License LLC
Latitude (NAD 83)	39° 35' 54.0" N
Longitude (NAD 83)	77° 45' 35.0" W
Ground Elevation (AMSL)	173.74 m / 570.0 ft
Antenna Centerline (AGL)	5.79 m / 19.0 ft
Antenna Model	Vertex 9 meter
Antenna Mode	Transmit 6.1 GHz
Interference Objectives: Long Term	-154.0 dBW/4 kHz 20%
Short Term	-131.0 dBW/4 kHz 0.0025%
Max Available RF Power	9.7 (dBW/4 kHz)

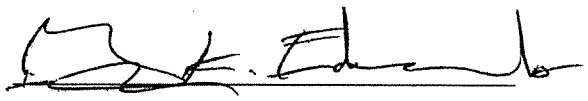
			Transmit 6.1 GHz	
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
0	0.00	101.81	-10.00	217.18
5	0.00	96.84	-10.00	217.18
10	0.00	91.86	-10.00	217.18
15	0.00	86.88	-10.00	217.18
20	0.00	81.90	-10.00	217.18
25	0.00	76.92	-10.00	217.18
30	0.00	71.95	-10.00	217.18
35	0.00	66.97	-10.00	217.18
40	0.00	62.00	-10.00	217.18
45	0.00	57.03	-10.00	217.18
50	0.00	52.06	-10.00	217.18
55	0.00	47.09	-9.82	217.92
60	0.00	42.14	-8.62	223.08
65	0.00	37.19	-7.26	229.09
70	0.00	32.26	-5.72	236.20
75	0.00	27.34	-3.92	244.82
80	0.00	22.47	-1.79	254.99
85	0.00	17.65	0.83	269.27
90	0.00	12.98	4.17	289.20
95	0.00	8.66	8.56	318.38
100	0.00	5.61	13.27	536.66
105	0.00	6.15	12.28	394.45
110	0.00	9.60	7.45	310.72
115	0.00	13.27	3.93	287.69
120	0.00	16.89	1.31	272.02
125	0.00	20.41	-0.75	260.53
130	0.00	23.83	-2.43	251.68
135	0.00	27.11	-3.83	245.27
140	0.00	30.23	-5.01	239.54
145	0.00	33.14	-6.01	234.83
150	0.00	35.82	-6.85	230.94
155	0.00	38.20	-7.55	227.78
160	0.00	40.26	-8.12	225.25
165	0.00	41.93	-8.56	223.32
170	0.00	43.16	-8.88	221.95
175	0.00	43.92	-9.07	221.14
180	0.00	44.18	-9.13	220.87
185	0.00	43.92	-9.07	221.14

Coordination Values	**HAGERSTOWN, MD**
Licensee Name	Intelsat License LLC
Latitude (NAD 83)	39° 35' 54.0" N
Longitude (NAD 83)	77° 45' 35.0" W
Ground Elevation (AMSL)	173.74 m / 570.0 ft
Antenna Centerline (AGL)	5.79 m / 19.0 ft
Antenna Model	Vertex 9 meter
Antenna Mode	Transmit 6.1 GHz
Interference Objectives: Long Term	-154.0 dBW/4 kHz 20%
Short Term	-131.0 dBW/4 kHz 0.0025%
Max Available RF Power	9.7 (dBW/4 kHz)

			Transmit 6.1 GHz	
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
190	0.00	43.16	-8.88	221.95
195	0.00	41.93	-8.56	223.32
200	0.00	40.26	-8.12	225.25
205	0.00	38.20	-7.55	227.78
210	0.00	35.81	-6.85	230.94
215	0.00	33.14	-6.01	234.83
220	0.00	30.22	-5.01	239.55
225	0.00	27.11	-3.83	245.27
230	0.00	23.83	-2.43	251.67
235	0.00	20.42	-0.75	260.52
240	0.00	16.89	1.31	272.04
245	0.00	13.28	3.92	287.67
250	0.00	9.59	7.46	310.80
255	0.00	6.33	11.96	402.56
260	0.00	6.11	12.35	518.24
265	0.00	9.18	7.93	313.99
270	0.00	13.46	3.77	286.74
275	0.00	18.11	0.55	267.72
280	0.00	22.90	-2.00	253.91
285	0.00	27.76	-4.09	244.01
290	0.00	32.66	-5.85	235.56
295	0.00	37.59	-7.38	228.57
300	0.00	42.53	-8.72	222.65
305	0.00	47.48	-9.91	217.55
310	0.00	52.44	-10.00	217.18
315	0.00	57.40	-10.00	217.18
320	0.00	62.37	-10.00	217.18
325	0.00	67.34	-10.00	217.18
330	0.00	72.31	-10.00	217.18
335	0.00	77.28	-10.00	217.18
340	0.00	82.26	-10.00	217.18
345	0.00	87.23	-10.00	217.18
350	0.00	92.21	-10.00	217.18
355	0.00	97.18	-10.00	217.18

Certification

I hereby certify that I am the technically qualified person responsible for the preparation of the frequency coordination data contained in this report. I am familiar with Parts 101 and 25 of the FCC Rules and Regulations and I have either prepared or reviewed the frequency coordination data submitted with this report, and that it is complete and correct to the best of my knowledge and belief.

BY: 

Gary K. Edwards
Senior Manager
COMSEARCH
19700 Janelia Farm Boulevard
Ashburn, VA 20147

DATED: February 22, 2018

Exhibit B

PETITION FOR WAIVER OF SECTIONS 25.137 AND 25.114

Pursuant to Section 25.137 of the Federal Communications Commission's ("Commission" or "FCC") rules, earth station applicants "requesting authority to communicate with a non-U.S. licensed space station" to serve the United States must demonstrate that U.S.-licensed satellite systems have effective competitive opportunities to provide analogues services in certain countries and must provide the same legal and technical information for the non-U.S.-licensed space station as required by Section 25.114 for U.S.-licensed space stations.[1] Intelsat License LLC ("Intelsat") herein seeks authority to provide launch and early orbit phase ("LEOP") services—not commercial services—to the United States, and thus believes that Section 25.137 does not apply.[2]

To the extent the Commission determines, however, that Intelsat's request for authority to provide LEOP services on a special temporary basis is a request to serve the United States with a non-U.S.-licensed satellite, Intelsat respectfully requests a waiver of Sections 25.137 and 25.114 of the Commission's rules.[3] The Commission may grant a waiver for good cause shown.[4] The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.[5] In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.[6] Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

In this case, good cause exists for a waiver of both Section 25.137 and Section 25.114 of the FCC's rules. With respect to Section 25.114, Intelsat seeks authority only to provide LEOP services for the Bangabandhu-1 ("BS-1") satellite. The information sought by Section 25.114 is not relevant to LEOP services. Moreover, Intelsat does not have—and would not easily be able to obtain—such information because Intelsat is not the operator of the BS-1 satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with Thales Alenia Space, the manufacturer of the BS-1 satellite, to conduct LEOP services.

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1 47 C.F.R. § 25.137.

2 *See EchoStar Satellite Operating Company Application for Special Temporary Authority Related to Moving the EchoStar 6 Satellite from the 77° W.L. Orbital Location to the 96.2° W.L. Orbital Location, and to Operate at the 96.2° W.L. Orbital Location*, Order and Authorization, 28 FCC Rcd. 4229 (2013) (noting that operating TT&C earth stations in the United States with a foreign-licensed satellite does not constitute "DBS service").

3 47 C.F.R. §§ 25.137 and 25.114.

4 47 C.F.R. § 1.3.

5 *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

6 *WAIT Radio v. FCC*, 419 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

The information required under Section 25.114 of the FCC's rules is not necessary to determine potential harmful interference. The Schedule S information for this satellite would pertain to the operation of the BS-1 satellite at its final orbital location. However, the present application for LEOP services involves communications *prior* to the satellite attaining its final location in the geostationary orbit. In other words, during the LEOP mission, the earth station will not be communicating with a satellite located in the geostationary orbit. Rather, it will be transmitting to a satellite traveling on its "transfer orbit" or "LEOP path," which starts immediately following its separation from a launch vehicle, and ends when the satellite reaches its geostationary orbital location. Moreover, as with any STA, Intelsat will perform the LEOP services on a non-interference basis.

Because it is not relevant to the service for which Intelsat seeks authorization, and because obtaining the information would be a hardship, Intelsat seeks a waiver of all the information required by Section 25.114 of the Commission's rules. Intelsat has provided in this STA request the required technical information that is relevant to the LEOP services for which Intelsat seeks authorization.

Good cause also exists to waive Section 25.137 of the agency's rules. Section 25.137 is designed to ensure that "U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services" in other countries.[7] Here, there is no service being provided by the satellite; it is simply being placed in its orbital location after separating from the launch vehicle. Thus, the purpose of Section 25.137 would not be served by applying these rules to LEOP services. For example, Section 25.137(d)(4) requires earth station applicants requesting authority to operate with a non-U.S.-licensed space station that is not in orbit and operating to post a bond.[8] The underlying purpose of Section 25.137(d)(4)—to provide parity between U.S.-licensed and non-U.S.-licensed commercial satellite systems in discouraging orbital location warehousing—would not be served by requiring Intelsat to post a bond to provide approximately 30 days of LEOP services to the BS-1 satellite.

It is Intelsat's understanding that BS-1 is licensed by Bangladesh, which is a WTO-member country. Thus, the purpose of Section 25.137—to ensure that U.S. satellite operators enjoy "effective competitive opportunities" to serve certain foreign markets—will not be undermined by grant of this waiver request.

Finally, Intelsat notes that it expects to operate with the BS-1 satellite using its U.S. earth station for a period of approximately 30 days. Requiring Intelsat to obtain copious technical and legal information from an unrelated party, where there is no risk of harmful interference and the operations will cease after approximately 30 days, would pose undue hardship without serving underlying policy objectives. Given these particular facts, the waiver sought herein is plainly appropriate.

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7 47 C.F.R. § 25.137(a).

8 *See* 47 C.F.R. §25.137(d)(4).