E040125 SES-STA-20180305-00187 IB2018000538
Intelsat License LLC

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 30−Day STA Using Riverside, CA Earth Station E040125 to Provide LEOP Services for IRNSS−1I Satellite

1. Applicant

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

GRANTED
International Bureau

File # SES-STA-20180305-00187
E040125
Call Sign Grant Date 4-6-18
(or other identifier)
Term Dates
From: 4-6-18 To: 5-6-18
Approved:

Applicant: Intelsat License LLC
Call Sign: E040125
File No.: SES-STA-20180305-00187

Intelsat License LLC ("Intelsat") is granted special temporary authority (STA) for 30 days, beginning April 06, 2018, to operate its Riverside, CA fixed earth station to provide launch and early orbit phase (LEOP) services for the Indian Regional Navigational Satellite System ("IRNSS") 1I satellite, in the 6415.0 MHz, and 6423.496 MHz (Earth-to-space) and 4188.768 MHz and 4196.928 MHz (space-to-Earth) frequencies licensed by India, as it drifts to its permanent location of 55.0° E.L. orbital location under the following conditions:

1. Operations, shall not cause harmful interference to or claim protection from other lawfully operating stations and it shall cease transmission(s) immediately upon notice of such interference

2. All operators of satellites 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 IRNSS 1I satellite LEOP mission is as follows: Ph.: 24/7 point of contact.: (703)559-7701-East Coast Operations Center (primary), and (310) 525-5591-West Coast Operations Center (back-up). Request to speak with Harry Burnham or Kevin Bell.

3. Intelsat will maintain full operational control with IRNSS 1I satellite at all times.

4. Intelsat will maintain IRNSS 1I satellite with an east-west longitudinal station-keeping tolerance of +/- 0.05 degree at 55.0° E.L. orbital location.

5. In the event of any harmful interference as a result of operations under this grant of STA, Intelsat shall cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.

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

7. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future Intelsat applications.

This grant 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-20180305-00187
E040125
Call Sign _____ Grant Date 4-6-18
(or other identifier)
Term Dates
From: 4-6-18 To: 5-6-18
Approved: [signature]

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. CityNuevo	8. Latitude (dd mm ss.s h) 33 47 43.6 N

9. State CA	10. Longitude (dd mm ss.s h) 117 5 20.4 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 March 31, 2018, to use its Riverside, California C-band earth station, call sign E040125, to provide launch and early orbit phase services for the Indian Regional Navigational Satellite System 1I satellite that, due to an unexpected delay, is now

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 March 31, 2018, to use its Riverside, California C-band earth station, call sign E040125, to provide launch and early orbit phase services for the Indian Regional Navigational Satellite System 1I satellite that, due to an unexpected delay, is now expected to launch on March 31, 2018.

EXHIBIT A

Prepared By

COMSEARCH

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

Prepared For

Intelsat License LLC
Nuevo, California
Temporary Transmit-Only Earth Station
Operation Dates: 1/22/2018 - 02/21/2018

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 November 09, 2017.

Company

ABC Holding Company Inc.
AT&T Mobility Spectrum LLC - N CA
AT&T Mobility Spectrum LLC - Southern CA
Air Sites 2000 LLC
Anaheim City, of
Arizona Public Service Company (APS)
Arizona, State Of
BNSF Railway Company
CCO SoCal I, LLC
California Internet Solutions, Inc.
California, State of
Calvary Chapel of Costa Mesa
Cellco Partnership - Southern California
City of Los Angeles Dept Water & Power
City of Montebello
City of Yuma
Coachella Valley Water District
Coast Community College District
Commnet Four Corners, LLC
DM Ventures, Inc. dba Warp2Biz
DRS Global Enterprise Solutions, Inc.
Entravision Holdings, LLC
Federal Communication Commission
Fisher Wireless Services, Inc.
Fresno MSA Limited Partnership
Frontier California Inc.
Glendale City California
Global Telecom & Technology Americas, In
GovNET Licenses LLC
ION Media Los Angeles License, Inc.
Imperial Irrigation District
KTLA, LLC
Kern Ed Telecom Consortium

Kern, County of
LDM Engineering
Lightwave Broadband LLC
Los Angeles County Dept of Public Works
Los Angeles County FCC Licensing Section
Los Angeles Regional Interoperable Comm
Los Angeles SMSA Ltd. Partnership
MHO Networks
Metropolitan Water Dist of So California
Mobile Relay Associates Inc.
New Cingular Wireless PCS LLC - AZ
New Cingular Wireless PCS - Los Angeles
New Cingular Wireless PCS LLC - N CAL
New Cingular Wireless PCS LLC -San Diego
Nextel of California Inc.
Norris, Samuel O
Northrop Grumman Systems Corp.
Nrj TV La License Co, LLC
Olympic Wireless, LLC
Orange, County of, CA
Pacific Bell Tel Com dba AT&T California
Pacific Lightwave Inc
Qwest Corporation
Regional 3Cs
Riverside, County of
San Bernardino County of California
San Diego Broadband
San Diego Gas & Electric Company
San Diego, City of
San Diego, County of
Skyriver Communications
Southern California Edison Company
Southern California Gas Company
Southern California Regional Rail Auth.
Spectrum Link, Inc.
Sprint Telephony PCS, L.P.
Station Venture Operations, LP
T-Mobile License LLC
TV Microwaves Company
Telink Networks SW, LLC
Time Warner Cable Pacific West LLC
Turn Wireless, LLC
Ultimate Internet Access, Inc
Union Pacific Railroad Company
University of California, HPWREN
Vectus, Inc
Verizon Wireless (VAW) LLC (Southern CA)
Verizon Wireless (VAW) LLC-N CA/NV
Western Broadband Inc.
Western Technical Services
Wisprenn

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:	11/09/2017
Job Number:	171109COMSGE10

Administrative Information	
Status	TEMPORARY (Operation from 01/22/2018 to 02/21/2018)
Call Sign	TEMP02
Licensee Code	INTELS
Licensee Name	Intelsat License LLC

Site Information	**NUEVO, CA**
Venue Name	
Latitude (NAD 83)	33° 47' 43.6" N
Longitude (NAD 83)	117° 5' 20.4" W
Climate Zone	A
Rain Zone	4
Ground Elevation (AMSL)	566.62 m / 1859.0 ft

Link Information	
Satellite Type	Geostationary
Mode	TO - Transmit-Only
Modulation	Analog and Digital
Satellite Arc	45° W to 170° West Longitude
Azimuth Range	100.2° to 247.2°
Corresponding Elevation Angles	6.2° / 22.0°
Antenna Centerline (AGL)	7.32 m / 24.0 ft

Antenna Information		**Transmit - FCC32**
Manufacturer		Vertex
Model		11 meter
Gain / Diameter		55.5 dBi / 11.0 m
3-dB / 15-dB Beamwidth		0.29° / 0.54°
Max Available RF Power	(dBW/4 kHz)	6.6
	(dBW/MHz)	30.6
Maximum EIRP	(dBW/4 kHz)	62.1
	(dBW/MHz)	86.1
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)	1M00FXD / 6415.0 1M00FXD / 6417.16 1M00FXD / 6423.496
Max Great Circle Coordination Distance	469.1 km / 291.5 mi
Precipitation Scatter Contour Radius	263.7 km / 163.8 mi

Coordination Values	**NUEVO, CA**
Licensee Name	Intelsat License LLC
Latitude (NAD 83)	33° 47' 43.6" N
Longitude (NAD 83)	117° 5' 20.4" W
Ground Elevation (AMSL)	566.62 m / 1859.0 ft
Antenna Centerline (AGL)	7.32 m / 24.0 ft
Antenna Model	Vertex 11 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	6.6 (dBW/4 kHz)

			Transmit 6.1 GHz	
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
0	0.91	100.15	-10.00	152.14
5	2.23	95.18	-10.00	118.47
10	1.88	90.19	-10.00	125.87
15	2.42	85.20	-10.00	114.85
20	2.49	80.21	-10.00	113.43
25	2.56	75.22	-10.00	112.06
30	3.50	70.22	-10.00	100.00
35	3.34	65.23	-10.00	100.00
40	3.36	60.23	-10.00	100.00
45	3.28	55.24	-10.00	100.00
50	2.88	50.27	-10.00	106.10
55	2.50	45.31	-9.40	115.40
60	2.77	40.31	-8.14	115.04
65	3.44	35.29	-6.69	108.25
70	3.10	30.33	-5.05	120.81
75	3.19	25.36	-3.10	126.35
80	3.76	20.33	-0.70	125.17
85	3.33	15.45	2.28	143.57
90	3.39	10.56	6.41	162.08
95	2.51	6.34	11.94	209.63
100	2.99	3.18	19.45	469.15
105	3.63	5.38	13.72	196.69
110	3.84	9.29	7.80	159.30
115	3.70	13.36	3.86	143.49
120	3.87	17.17	1.13	130.35
125	3.84	21.02	-1.07	122.45
130	4.49	24.32	-2.65	107.04
135	3.88	28.30	-4.29	109.69
140	4.24	31.47	-5.45	100.03
145	4.11	34.76	-6.53	100.00
150	4.48	37.41	-7.32	100.00
155	4.67	39.84	-8.01	100.00
160	4.09	42.53	-8.72	100.00
165	4.55	43.90	-9.06	100.00
170	4.85	44.86	-9.30	100.00
175	5.79	44.68	-9.25	100.00
180	6.19	44.52	-9.21	100.00
185	6.91	43.57	-8.98	100.00

Coordination Values	**NUEVO, CA**
Licensee Name	Intelsat License LLC
Latitude (NAD 83)	33° 47' 43.6" N
Longitude (NAD 83)	117° 5' 20.4" W
Ground Elevation (AMSL)	566.62 m / 1859.0 ft
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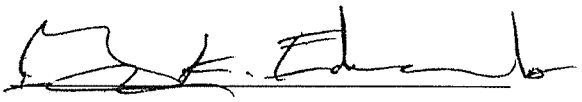
Antenna Model	Vertex 11 meter
Antenna Mode	Transmit 6.1 GHz
Interference Objectives: Long Term	-154.0 dBW/4 kHz 20%
Short Term	-131.0 dBW/4 kHz 0.0025%
Max Available RF Power	6.6 (dBW/4 kHz)

			Transmit 6.1 GHz	
Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Horizon Gain (dBi)	Coordination Distance (km)
190	7.27	42.53	-8.72	100.00
195	6.99	41.64	-8.49	100.00
200	6.27	40.64	-8.22	100.00
205	5.71	38.99	-7.77	100.00
210	5.71	36.45	-7.04	100.00
215	6.70	32.84	-5.91	100.00
220	7.49	29.16	-4.62	100.00
225	7.03	26.16	-3.44	100.00
230	5.65	23.57	-2.31	100.00
235	6.10	19.95	-0.50	100.00
240	5.73	17.76	0.76	106.14
245	5.59	16.57	1.52	110.51
250	5.18	17.07	1.20	113.23
255	4.95	18.72	0.19	111.72
260	4.51	21.57	-1.35	111.63
265	4.74	24.62	-2.78	103.20
270	4.38	28.54	-4.39	102.04
275	4.51	32.48	-5.79	100.00
280	4.14	36.88	-7.17	100.00
285	3.19	41.60	-8.48	105.88
290	2.77	46.16	-9.61	109.56
295	1.04	51.16	-10.00	146.45
300	0.82	55.70	-10.00	156.97
305	0.00	60.40	-10.00	204.80
310	0.00	64.94	-10.00	204.80
315	0.00	69.50	-10.00	204.80
320	0.00	74.10	-10.00	204.80
325	0.00	78.71	-10.00	204.80
330	0.00	83.34	-10.00	204.80
335	0.00	87.97	-10.00	204.80
340	0.00	92.60	-10.00	204.80
345	0.00	97.24	-10.00	204.80
350	0.00	101.86	-10.00	204.80
355	0.00	105.10	-10.00	204.80

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: November 21, 2017

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 IRNSS-1I 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 IRNSS-1I satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with Indian Space Research Organisation, the manufacturer of the IRNSS-1I 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 IRNSS-1I 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 IRNSS-1I satellite.

It is Intelsat's understanding that IRNSS-1I is licensed by India, 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 IRNSS-1I 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).

INTELSAT
Envision. Connect. Transform.

March 5, 2018

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 E040125

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests a grant of Special Temporary Authority ("STA")[1] for 30 days, commencing March 31, 2018, to use its Riverside, California C-band earth station—call sign E040125—to provide launch and early orbit phase ("LEOP") services for the Indian Regional Navigational Satellite System ("IRNSS") 1I satellite that, due to an unexpected delay, is now expected to launch on March 31, 2018.[2] Intelsat expects the LEOP period to last approximately 30 days.[3]

The IRNSS-1I LEOP operations will be performed at the following frequencies: 6415.0 MHz and 6423.496 MHz (RHCP) in the uplink, and 4188.768 MHz and 4196.928 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.[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 IRNSS-1I 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, FCC Form 159, a $200.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

[2] Intelsat previously filed and received a grant of STA to provide LEOP services for IRNSS-1I. See *Satellite Communications Services Information; Actions Taken*, Public Notice, Report No. SES-02029, File No. SES-STA-20180102-00002 (Jan. 24, 2018). Due to the unexpected launch delay, Intelsat requests a new STA grant.

[3] The permanent orbital location and in-orbit testing location for IRNSS-1I, which Intelsat understands is licensed by India, will be 55.0° E.L.

[4] Indian Space Research Organisation, the manager of the IRNSS-1I LEOP mission, will handle the coordination.

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.

Finally, Intelsat clarifies that during the IRNSS-1I launch, the Indian Space Research Organisation ("ISRO") will control the spacecraft. 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 remain in control of the baseband unit, RF equipment, and antenna.

Grant of this STA request will allow Intelsat to help launch the IRNSS-1I satellite. This, in turn, will help provide services to India and neighboring areas from the 55.0° E.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