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IB2018003845

E040125 SES-STA-20180716-01790 Intelsat License LLC

2. Contact			
Name:	Cynthia J. Grady Phon	ne Number:	703-559-6949
Company:	Intelsat US LLC Fax	Number:	703-559-8539
Street:	7900 Tysons One Place E–M	1ail:	cynthia.grady@intelsat.com
City:	McLean	:0	VA
Country:	USA Zipc	code:	22102 -5972
Attention:	Rela	ationship:	Legal Counsel
(If your application is ruapplication. Please ente 3. Reference File Num	elated to an application filed with the Conn r only one.) ber or Submission ID	nission, enter either the file	number or the IB Submission ID of the related
4a. Is a fee submitter If Yes, complete an	d with this application? d attach FCC Form 159. If No, indicate re	eason for fee exemption (see	: 47 C.F.R.Section 1.1114).
O Governmental Enti	ty O Noncommercial educational licens	see	
• Other(please explai	ш):		
4b. Fee Classification	CGX – Fixed Satellite Transmit/Receive E	earth Station	
5. Type Request			
O Use Prior to Grant	O Change Static	on 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
 Please supply any need attachments. Attachment 1: STA Request 	A Attachment 3: Exhibit B
12. Description. (If the complete description does not appear in this b Intelsat License LLC herein requests a grant commencing August 1, 2018, to use its Riversi sign E040125, to provide launch and early ork Telkom-4 is expected to launch on August 1, 2	<pre>bx, please go to the end of the form to view it in its entirety.) of Special Temporary Authority for 30 days, de, California C-band earth station, call oit phase services for the Telkom-4 satellite. 018.</pre>
13. By checking Yes, the undersigned certifies that neither applicant no subject to a denial of Federal benefits that includes FCC benefits pursu of 1988, 21 U.S.C. Section 862, because of a conviction for possession See 47 CFR 1.2002(b) for the meaning of "party to the applicatio	r any other party to the application is ant to Section 5301 of the Anti–Drug Act or distribution of a controlled substance.
14. Name of Person Signing Cynthia J. Grady	15. Title of Person Signing Regulatory Counsel, Intelsat US LLC
WILLFUL FALSE STATEMENTS MADE ON THIS FORM (U.S. Code, Title 18, Section 1001), AND/OR REV (U.S. Code, Title 47, Section 312(a)(1)), AND/OF	ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT OCATION OF ANY STATION AUTHORIZATION & FORFEITURE (U.S. Code, Title 47, Section 503).

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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.



July 16, 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 August 1, 2018, to use its Riverside, California C-band earth station—call sign E040125—to provide launch and early orbit phase ("LEOP") services for the Telkom-4 satellite. Telkom-4 is expected to launch on August 1, 2018.² Intelsat expects the LEOP period to last approximately 30 days.

The Telkom-4 LEOP operations will be performed at the following frequencies: 5926.0 MHz and 6424.0 MHz (LHCP, Linear) in the uplink, and 4199.875 MHz and 3701.75 MHz (RHCP, Linear) 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 Telkom-4 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.

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 permanent orbital location and in-orbit testing location for Telkom-4, which Intelsat understands is licensed by Indonesia, will be 108.0° E.L.

³ SSL, the manager of the Telkom-4 LEOP mission, will handle the coordination.

Ms. Marlene H. Dortch July 16, 2018 Page 2

Finally, Intelsat clarifies that during the Telkom-4 launch, SSL will control the spacecraft. SSL 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 SSL. 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 Telkom-4 satellite. This, in turn, will help provide services to Indonesia and neighboring areas from the 108.0° 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,

<u>Cynthia J. Grady</u> Cynthia J. Grady Regulatory Counsel Intelsat US LLC

cc: Paul Blais

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: 08/07/2018 - 09/06/2018

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 June 04, 2018.

Company

ABC Holding Company Inc. AC BidCO LLC AT&T Mobility Spectrum LLC - Arizona AT&T Mobility Spectrum LLC - N CA AT&T Mobility Spectrum LLC - Southern CA Air Sites 2000 LLC Alltel Comm Southwest Holdings Inc. Anaheim City, of Arizona Public Service Company (APS) Arizona, State Of **BNSF Railway Company** CCO SoCal I, LLC California Internet Solutions, Inc. California Internet, L.P. California, State of Calvary Chapel of Costa Mesa Cellco Partnership - Southern California City of Casa Grande 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 Fresno MSA Limited Partnership Frontier California Inc. Gila River Cellular General Partnership 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 City Info Technology Agency Los Angeles County Dept of Public Works Los Angeles County FCC Licensing Section Los Angeles County Metro Transit Auth Los Angeles Regional Interoperable Comm Los Angeles SMSA Ltd. Partnership Los Angeles Unified School District **MHO Networks** Maricopa County Wireless Systems Mediacom California LLC 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 New Cingular Wireless PCS, LLC - SE Cal Nextel License Holdings 4 Inc. 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 Phoenix, City of Pinal, County of 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 Spectrum L.P. Sprint Telephony PCS, L.P. Station Venture Operations, LP T-Mobile License LLC **TV Microwaves Company** Table Top Telephone Company Telink Networks SW, LLC Time Warner Cable Pacific West LLC **Tucson Electric Power Company**

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 Verizon Wireless(VAW) LLC-AZ/CO/NM/NV/UT Western Broadband Inc. Wiline Spectrum Holdings LLC 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: Job Number:		06/04 18060	/2018 04COMSGE02			
Administrative InformationStatusTEMFCall SignTEMFLicensee CodeINTELicensee NameIntels		TEMP TEMP INTEL Intelsa	PORARY (Operation from 08/07/2018 to 09/06/2018) 209 LS at License LLC			
Site Information Venue Name Latitude (NAD 83) Longitude (NAD 83) Climate Zone Rain Zone Ground Elevation (AM	SL)	NUE 33° 47 117° 5 A 4 566.62	/O, CA 7' 43.6" N 5' 20.4" W 2 m / 1859.0 ft			
Link InformationSatellite TypeGModeToModulationAiSatellite Arc48Azimuth Range10Corresponding Elevation Angles6.Antenna Centerline (AGL)7.		Geost TO - T Analog 45° W 100.2° 6.2° / 7.32 n	Seostationary TO - Transmit-Only Analog and Digital IS° W to 190° West Longitude 00.2° to 260.3° S.2° / 5.5° 7.32 m / 24.0 ft			
Antenna Information Manufacturer Model Gain / Diameter 3-dB / 15-dB Beamwid	n Ith		Transmit - FCC32 Vertex 11 KPC 55.5 dBi / 11.0 m 0.29° / 0.54°			
Max Available RF Power	(dBW/4 kł (dBW/MH:	Hz) z)	10.0 34.0			
Maximum EIRP	(dBW/4 kł (dBW/MH:	Hz) z)	65.5 89.5			
Interference Objectives:	: Long Term Short Term		-154.0 dBW/4 kHz 20% -131.0 dBW/4 kHz 0.0025%			
Frequency Information Emission / Frequency Range (MHz)			Transmit 6.1 GHz 1M00FXD / 5926.0 1M00FXD / 6424.0			
Max Great Circle Coordination Distance Precipitation Scatter Contour Radius			552.9 km / 343.5 mi 373.6 km / 232.1 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 Terr	m -154.0 dBW/4 kHz	20%
Short Ter	m -131.0 dBW/4 kHz	0.0025%
Max Available RF Power	10.0 (dBW/4 kHz)	

			Transm	iit 6.1 GHz	
	Horizon	Antenna	Horizon	Coordination	
Azimuth (°)	Elevation (°)	Discrimination (°)	Gain (dBi)	Distance (km)	
0	0.91	99.68	-10.00	169.07	
5	2.23	95.18	-10.00	131.08	
10	1.88	90.19	-10.00	137.21	
15	2.42	85.20	-10.00	127.53	
20	2.49	80.21	-10.00	126.14	
25	2.56	75.22	-10.00	124.79	
30	3.50	70.22	-10.00	107.49	
35	3.34	65.23	-10.00	110.42	
40	3.36	60.23	-10.00	110.08	
45	3.28	55.24	-10.00	111.48	
50	2.88	50.27	-10.00	118.92	
55	2.50	45.31	-9.40	128.20	
60	2.77	40.31	-8.14	128.01	
65	3.44	35.29	-6.69	121.12	
70	3.10	30.33	-5.05	133.29	
75	3.19	25.36	-3.10	138.01	
80	3.76	20.33	-0.70	137.22	
85	3.33	15.45	2.28	159.76	
90	3.39	10.56	6.41	181.41	
95	2.51	6.34	11.94	228.00	
100	2.99	3.18	19.45	507.65	
105	3.63	5.38	13.72	213.19	
110	3.84	9.29	7.80	178.97	
115	3.70	13.36	3.86	159.63	
120	3.87	17.17	1.13	143.19	
125	3.84	21.02	-1.07	134.36	
130	4.49	24.32	-2.65	120.03	
135	3.88	28.30	-4.29	122.38	
140	4.24	31.47	-5.45	112.72	
145	4.11	34.76	-6.53	110.43	
150	4.48	37.41	-7.32	102.47	
155	4.67	39.84	-8.01	100.00	
160	4.09	42.53	-8.72	102.52	
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
Antenna Centerline (AGL)	7.32 m / 24.0 ft
Antenna Model	Vertex 11 meter
Antenna Mode	Transmit 6.1 GHz
Interference Objectives: Long Terr	m -154.0 dBW/4 kHz 20%
Short Ter	m -131.0 dBW/4 kHz 0.0025%
Max Available RF Power	10.0 (dBW/4 kHz)

			Transm	it 6.1 GHz	
	Horizon	Antenna	Horizon	Coordination	
Azimuth (°)	Elevation (°)	Discrimination (°)	Gain (dBi)	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	108.26	
235	6.10	19.58	-0.30	111.77	
240	5.73	16.02	1.88	124.28	
245	5.59	12.21	4.83	136.15	r
250	5.18	8.50	8.77	159.60	
255	4.95	4.62	15.38	201.61	
260	4.51	1.01	31.92	552.92	
265	4.74	4.76	15.05	203.04	
270	4.38	9.77	7.26	164.12	
275	4.51	14.74	2.79	140.37	
280	4.14	19.75	-0.39	133.64	
285	3.19	24.80	-2.86	138.86	
290	2.77	29.82	-4.86	138.99	
295	1.04	34.95	-6.59	178.89	
300	0.82	39.93	-8.03	183.15	
305	0.00	44.97	-9.32	221.33	
310	0.00	49.93	-10.00	218.44	
315	0.00	54.89	-10.00	218.44	
320	0.00	59.86	-10.00	218.44	
325	0.00	64.83	-10.00	218.44	
330	0.00	69.80	-10.00	218.44	
335	0.00	74.78	-10.00	218.44	
340	0.00	79.75	-10.00	218.44	
345	0.00	84.73	-10.00	218.44	
350	0.00	89.71	-10.00	218.44	
355	0.00	94.68	-10.00	218.44	

Frequency Coordination and Interference Analysis Report

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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: <u>June 25, 2018</u>

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 Telkom-4 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 Telkom-4 satellite. Intelsat has a contract with SSL, the manufacturer of the Telkom-4 satellite, to conduct LEOP services.

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

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.

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 Telkom-4 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 Telkom-4 satellite.

It is Intelsat's understanding that Telkom-4 is licensed by Indonesia, which is a WTOmember 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 Telkom-4 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.

⁷ 47 C.F.R. § 25.137(a).

⁸ See 47 C.F.R. §25.137(d)(4).

Applicant: Intelsat License LLC Call Sign: E040125 File No.: SES-STA-20180716-01790 Special Temporary Authority (STA)

Intelsat License LLC is granted STA, for 30 days, commencing August 1, 2018 to provide launch and early orbit phase ("LEOP") services in the 5926.0 MHz and 6424.0 MHz frequencies (LHCP, Linear) (Earth-to-space) and in the 4199.875 MHz and 3701.75 MHz frequencies (RHCP, Linear) (space-to-Earth) for the Indonesia licensed Telkom-4 satellite at its permanent orbital location 108.0° E from Riverside, California at graphical coordinates 33° 47' 43.6" N, 117° 05' 20.4" W. The services will be under the following conditions:

1. LEOP operations will be using the coordinated emission carrier 1M00FXD, eirp, and eirp density.

2. Operations, 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.

3. In the event of any harmful interference under this grant of STA, Intelsat License LLC must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.

4. 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 SES-12 satellite 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.

5. Grant of this authorization 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 immediately.

016-01790 Grant Date identifier) (or other International Bureau