

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Request for STA Using a 7.3m S-band Antenna at Paumalu, Hawaii for TT&C, LEOP, and IOT of the OTB Satellite Mission

1. Applicant

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

30 days
"With conditions"
File # SES-STA-20181010-03148
Call Sign N/A Grant Date 05/01/2019
(or other identifier)
Term Dates
From: 06/20/2019 To: 07/20/2019
Approved: [Signature]



| | |
|---|---|
| 2. Contact | |
| Name: Cynthia J.Grady | Phone Number: 703-559-6949 |
| Company: Intelsat US LLC | Fax Number: 703-559-8539 |
| Street: 7900 Tysons One Place | E-Mail: cynthia.grady@intelsat.com |
| City: McLean | State: VA |
| Country: USA | Zipcode: 22102 - |
| 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? <input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R.Section 1.1114). <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee <input type="radio"/> Other(please explain): | |
| 4b. Fee Classification CGX - Fixed Satellite Transmit/Receive Earth Station | |
| 5. Type Request | |
| <input checked="" type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other | |
| 6. Requested Use Prior Date | |
| 7. CityPaumalu | |
| 8. Latitude (dd mm ss.s h) 21 40 14.2 N | |

| | |
|--|--|
| 9. State HI | 10. Longitude (dd mm ss.s h) 158 2 7.8 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.) | <div style="border: 1px solid black; padding: 5px;"> <p>Intelsat License LLC herein requests a grant of Special Temporary Authority for 30 days, commencing November 30, 2018, to utilize a 7.3m S-band antenna located at its Paumalu, Hawaii teleport for telemetry, tracking, and command services during launch and early orbit phase and in-orbit testing of the General Atomics Orbital Test Bed satellite.</p> </div> |
| 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 <input checked="" type="radio"/> No <input type="radio"/> |
| 14. Name of Person Signing Cynthia J. Grady | 15. Title of Person Signing Senior Counsel, Intelsat US LLC |
| 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.

Applicant: Intelsat LLC
 File No.: SES-STA-20181010-03148
 Call Sign:


Intelsat License LLC is grant special temporary authority for 30 days beginning June 20, 2019 to operate its 7.3m earth station antenna in Paumalu, HI with the OTB non-geostationary orbit satellite in the 720 km x 720 km, 24°inclined orbit on center frequencies: 2061.0 MHz, 2062.0 MHz, and 2063.0 MHz (RHCP) (Earth-to-space) and 2272.5 MHz in (space-to-Earth) to provide telemetry, tracking, and command during its launch and early orbit phase (“LEOP”) and in-orbit testing (“IOT”) phases under the following conditions.

1. Operations are limited to:

| Frequency band (MHz) | Emission designator | Max eirp (dBW) | Max eirp density (dBW/4kHz) |
|------------------------------|---------------------|----------------|-----------------------------|
| 2061.0, 2062.0, and 2063 MHz | 19K2FXD 307KFXD | 34 | 15.4 |
| 2272.5 | 307KFXD | n/a | n/a |

2. Polarization: left and right circular
3. Intelsat may only transmit intermittently over a 30-day period.
4. Intelsat agrees to accept any level of interference into this earth station from Federal users in the 2200-2290 MHz band.
5. Intelsat shall, at all times, take all necessary measures to ensure that operation of this (these) authorized earth station(s) does not create potential exposure of humans to radiofrequency radiation in excess of the FCC exposure limits defined in 47 CFR §§ 1.1307(b) and 1.1310. Physical measures must be taken to ensure compliance with limits for both occupational/controlled exposure and for general population/uncontrolled exposure, as defined in these rule sections. Compliance can be accomplished in most cases by appropriate restrictions, such as fencing. Requirements for restrictions can be determined by predictions based on calculations, modeling, or by field measurements. The FCC's OET Bulletin 65 (available on-line at [ww.fcc.gov/oet/rfsafety](http://www.fcc.gov/oet/rfsafety)) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alerting signs and protective equipment for workers

30 days *"With conditions"*



GRANTED

International Bureau

File # SES-STA-20181010-03148
Call Sign N/A **Grant Date** 05/01/2019
 (or other identifier)
Term Dates
From: 06/20/2019 **To:** 07/20/2019
Approved: Paul E. Glass



INTELSAT.

Envision. Connect. Transform.

October 8, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Request for Special Temporary Authority
7.3m S-band Antenna, Paumalu, Hawaii

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing November 30, 2018, to utilize a 7.3m S-band antenna located at its Paumalu, Hawaii teleport for telemetry, tracking, and command (“TT&C”) services during launch and early orbit phase (“LEOP”) and in-orbit testing (“IOT”) of the General Atomics Orbital Test Bed (“OTB”) satellite.² The launch of OTB is currently scheduled for November 30, 2018. Intelsat expects the OTB LEOP and IOT period to last approximately 75 days.

OTB will launch as part of the U.S. Air Force’s Space Technology Program (STP-2) and will carry the National Aeronautics and Space Administration’s (“NASA”) Deep Space Atomic Clock, the U.S. Air Force’s Modular Solar Array, and other payloads.³ Because OTB is a low-Earth orbit (“LEO”) non-geostationary orbit satellites (“NGSO”), TT&C services from the S-band antenna to the satellite will occur 1-4 times per day, ranging from 8-10 minutes in duration.⁴

The OTB operations will be performed in the following frequencies: 2061.0 MHz, 2062.0 MHz, and 2063.0 MHz (RHCP) in the uplink, and 2272.5 MHz in the downlink (RHCP). The proposed operations will be coordinated with all operators of satellites that use the same frequency bands and

¹ Intelsat has filed its STA request, an FCC Form 159, a \$210.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

² Intelsat understands that while the OTB satellite is not yet licensed, it will be licensed by the United States and that General Atomics has discussed the proposed satellite operations with Commission staff and other interested agencies.

³ See http://www.ga.com/websites/ga/images/products/defense/space-systems/OTB_Satellite_DS_0818E.pdf for more information.

⁴ The planned orbit for the OTB satellite is 720 km with an inclination of 24°.

Ms. Marlene H. Dortch
October 8, 2018
Page 2

are in the flight paths or are potentially affected by IOT operations.⁵ All operators of potentially affected satellites 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 7.3m S-band antenna operations 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 technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating commercial terrestrial facility and a waiver request.

Finally, Intelsat clarifies that during the OTB launch, ViaSat will control the spacecraft. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

Grant of this STA request will allow Intelsat to provide support U.S. Government missions aboard the OTB satellite and thereby promotes the public interest.

Grant of this STA request will allow Intelsat to safely place OTB in non-geostationary orbit; TT&C the spacecraft during IOT; and provide support U.S. Government missions aboard the OTB satellite 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
Senior Counsel
Intelsat US LLC

cc: Paul Blais

⁵ ViaSat, Intelsat's customer, will handle the coordination.

Prepared By

COMSEARCH

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

Prepared For

**Intelsat License LLC
Paumalu, Hawaii**

Temporary Transmit-Only Earth Station
Operation Dates: 10/15/2018 - 12/30/2018

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 August 27, 2018.

Company

3G Wireless, LLC
AERIAL VIDEO SYSTEMS
Alascom Inc
Borgeson, Tom R.
Broadcast Sports Inc.
Casper, John
Chicago Comnet Corp
Citywide News Network, Inc.
Cowboys Stadium LP
CP Communications
DCI II, INC.
Direct Broadcast Services, Inc.
Federal Communication Commission
Frontier California Inc.
HF Enterprises, Inc
Hallco Unlimited, Inc.
Hawaii Public Television Foundation
Hawaiian Telcom, Inc.
Heiden, William
im360 Entertainment
Information & Display Systems, Inc.
Information Super Station, LLC
Interlink Network Corp
International Communications Group, Inc
International Electronic Information Services, Inc
KHNL/KGMB License Subsidiary, LLC
KITV, Inc
Loop inc
MERCURY COMMUNICATIONS
Microwave Video Systems, LLC
Moreen, Steven K
NEW ENGLAND DIGITAL DISTRIBUTION, INC.
NEXSTAR BROADCASTING, INC.

NSM Surveillance
Navajo Communications Company
Onboard Images
Pacific Bell Tel Com dba AT&T California
Pacific Television Cneter
Penn Service Microwave Co., Inc.
Plateau Telecommunications, Inc.
Plum TV, LLC
Production & Satellite Services, Inc.
REMOTE FACILITIES CONSULTING SERVICES
RF Central, LLC
RF Film, Inc
Radiofone, Inc.
Randy Hermes Production
Remote Broadcasts, Inc.
Speedshotz, Inc
TTWN Networks, LLC
Unisat, Inc.
United Telephone - Southeast
Vitec Broadcast Services, Inc
Vyvx, LLC
Westar Satellite Services LP
Winged Vision Inc
Wolfe Air Aviation

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: 08/27/2018
Job Number: 180827COMSGE03

Administrative Information

Status: TEMPORARY (Operation from 10/15/2018 to 12/30/2018)
Call Sign: TEMP12
Licensee Code: INTELS
Licensee Name: Intelsat License LLC

Site Information

PAUMALU, HI
Venue Name
Latitude (NAD 83): 21° 40' 14.2" N
Longitude (NAD 83): 158° 2' 7.8" W
Climate Zone: C
Rain Zone: 4
Ground Elevation (AMSL): 131.98 m / 433.0 ft

Link Information

Satellite Type: Low Earth Orbit
Mode: TO - Transmit-Only
Modulation: Digital
Minimum Elevation Angle: 5.0°
Azimuth Range: 0.0° to 360°
Antenna Centerline (AGL): 3.66 m / 12.0 ft

Antenna Information

Transmit - FCC32
Manufacturer: Viasat
Model: 7.3 meter
Gain / Diameter: 40.9 dBi / 7.3 m
3-dB / 15-dB Beamwidth: 1.00° / 2.00°

Max Available RF Power (dBW/4 kHz): 15.4
(dBW/MHz): 39.4

Maximum EIRP (dBW/4 kHz): 56.3
(dBW/MHz): 80.3

Interference Objectives: Long Term: -154.0 dBW/4 kHz 20%
Short Term: -131.0 dBW/4 kHz 0.0025%

Frequency Information

Transmit 2.0 GHz
Emission / Frequency Range (MHz):
19K2FXD - 307KFXD / 2059.0 - 2059.0
19K2FXD - 307KFXD / 2061.0 - 2061.0
19K2FXD - 307KFXD / 2062.0 - 2062.0
19K2FXD - 307KFXD / 2063.0 - 2063.0

Max Great Circle Coordination Distance: 293.2 km / 182.2 mi
Precipitation Scatter Contour Radius: 364.4 km / 226.4 mi

| | | | |
|------------------------------------|------------------|----------------------|---------|
| Coordination Values | | PAUMALU, HI | |
| Licensee Name | | Intelsat License LLC | |
| Latitude (NAD 83) | | 21° 40' 14.2" N | |
| Longitude (NAD 83) | | 158° 2' 7.8" W | |
| Ground Elevation (AMSL) | | 131.98 m / 433.0 ft | |
| Antenna Centerline (AGL) | | 3.66 m / 12.0 ft | |
| Antenna Model | | Viasat 7,3 meter | |
| Antenna Mode | | Transmit 2.0 GHz | |
| Interference Objectives: Long Term | | -154.0 dBW/4 kHz | 20% |
| Short Term | | -131.0 dBW/4 kHz | 0.0025% |
| Max Available RF Power | 15.4 (dBW/4 kHz) | | |

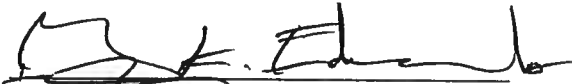
| Azimuth (°) | Horizon Elevation (°) | Antenna Discrimination (°) | Transmit 2.0 GHz | |
|-------------|-----------------------|----------------------------|--------------------|----------------------------|
| | | | Horizon Gain (dBi) | Coordination Distance (km) |
| 0 | 0.00 | 72.41 | 4.50 | 293.25 |
| 5 | 0.00 | 70.74 | 4.50 | 293.25 |
| 10 | 0.00 | 69.21 | 4.50 | 293.25 |
| 15 | 0.00 | 67.83 | 4.50 | 293.25 |
| 20 | 0.00 | 66.61 | 4.50 | 293.25 |
| 25 | 0.00 | 65.58 | 4.50 | 293.25 |
| 30 | 0.00 | 64.73 | 4.50 | 293.25 |
| 35 | 0.00 | 64.09 | 4.50 | 293.25 |
| 40 | 0.00 | 63.66 | 4.50 | 293.25 |
| 45 | 0.00 | 63.44 | 4.50 | 293.25 |
| 50 | 0.00 | 63.44 | 4.50 | 293.25 |
| 55 | 0.00 | 63.65 | 4.50 | 293.25 |
| 60 | 0.00 | 64.08 | 4.50 | 293.25 |
| 65 | 0.00 | 64.73 | 4.50 | 293.25 |
| 70 | 0.00 | 65.57 | 4.50 | 293.25 |
| 75 | 0.00 | 66.60 | 4.50 | 293.25 |
| 80 | 0.00 | 67.81 | 4.50 | 293.25 |
| 85 | 0.00 | 69.19 | 4.50 | 293.25 |
| 90 | 0.00 | 70.72 | 4.50 | 293.25 |
| 95 | 0.00 | 72.39 | 4.50 | 293.25 |
| 100 | 0.00 | 74.18 | 4.50 | 293.25 |
| 105 | 0.00 | 76.07 | 4.50 | 293.25 |
| 110 | 0.00 | 78.06 | 4.50 | 293.25 |
| 115 | 0.00 | 80.13 | 4.50 | 293.25 |
| 120 | 0.00 | 82.25 | 4.50 | 293.25 |
| 125 | 0.00 | 84.43 | 4.50 | 293.25 |
| 130 | 0.00 | 86.64 | 4.50 | 293.25 |
| 135 | 0.00 | 88.87 | 4.50 | 293.25 |
| 140 | 0.00 | 91.11 | 4.50 | 293.25 |
| 145 | 0.00 | 93.34 | 4.50 | 293.25 |
| 150 | 0.00 | 95.55 | 4.50 | 293.25 |
| 155 | 0.00 | 97.72 | 4.50 | 293.25 |
| 160 | 0.00 | 99.85 | 4.50 | 293.25 |
| 165 | 0.00 | 101.92 | 4.50 | 293.25 |
| 170 | 0.00 | 103.91 | 4.50 | 293.25 |
| 175 | 0.00 | 105.80 | 4.50 | 293.25 |
| 180 | 0.00 | 107.59 | 4.50 | 293.25 |
| 185 | 0.00 | 109.26 | 4.50 | 293.25 |

| | | | |
|----------------------------|------------------|----------------------|---------|
| Coordination Values | | PAUMALU, HI | |
| Licensee Name | | Intelsat License LLC | |
| Latitude (NAD 83) | | 21° 40' 14.2" N | |
| Longitude (NAD 83) | | 158° 2' 7.8" W | |
| Ground Elevation (AMSL) | | 131.98 m / 433.0 ft | |
| Antenna Centerline (AGL) | | 3.66 m / 12.0 ft | |
| Antenna Model | | Viasat 7,3 meter | |
| Antenna Mode | | Transmit 2.0 GHz | |
| Interference Objectives: | Long Term | -154.0 dBW/4 kHz | 20% |
| | Short Term | -131.0 dBW/4 kHz | 0.0025% |
| Max Available RF Power | 15.4 (dBW/4 kHz) | | |

| Azimuth (°) | Horizon Elevation (°) | Antenna Discrimination (°) | Transmit 2.0 GHz | |
|-------------|-----------------------|----------------------------|--------------------|----------------------------|
| | | | Horizon Gain (dBi) | Coordination Distance (km) |
| 190 | 0.00 | 110.79 | 4.50 | 293.25 |
| 195 | 0.00 | 112.17 | 4.50 | 293.25 |
| 200 | 0.00 | 113.39 | 4.50 | 293.25 |
| 205 | 0.00 | 114.42 | 4.50 | 293.25 |
| 210 | 0.00 | 115.27 | 4.50 | 293.25 |
| 215 | 0.00 | 115.91 | 4.50 | 293.25 |
| 220 | 0.00 | 116.34 | 4.50 | 293.25 |
| 225 | 0.00 | 116.56 | 4.50 | 293.25 |
| 230 | 0.00 | 116.56 | 4.50 | 293.25 |
| 235 | 0.00 | 116.35 | 4.50 | 293.25 |
| 240 | 0.00 | 115.92 | 4.50 | 293.25 |
| 245 | 0.00 | 115.27 | 4.50 | 293.25 |
| 250 | 0.00 | 114.43 | 4.50 | 293.25 |
| 255 | 0.00 | 113.40 | 4.50 | 293.25 |
| 260 | 0.00 | 112.19 | 4.50 | 293.25 |
| 265 | 0.00 | 110.81 | 4.50 | 293.25 |
| 270 | 0.00 | 109.28 | 4.50 | 293.25 |
| 275 | 0.00 | 107.61 | 4.50 | 293.25 |
| 280 | 0.00 | 105.82 | 4.50 | 293.25 |
| 285 | 0.00 | 103.93 | 4.50 | 293.25 |
| 290 | 0.00 | 101.94 | 4.50 | 293.25 |
| 295 | 0.00 | 99.87 | 4.50 | 293.25 |
| 300 | 0.00 | 97.75 | 4.50 | 293.25 |
| 305 | 0.00 | 95.57 | 4.50 | 293.25 |
| 310 | 0.00 | 93.36 | 4.50 | 293.25 |
| 315 | 0.00 | 91.13 | 4.50 | 293.25 |
| 320 | 0.00 | 88.89 | 4.50 | 293.25 |
| 325 | 0.00 | 86.66 | 4.50 | 293.25 |
| 330 | 0.00 | 84.45 | 4.50 | 293.25 |
| 335 | 0.00 | 82.28 | 4.50 | 293.25 |
| 340 | 0.00 | 80.15 | 4.50 | 293.25 |
| 345 | 0.00 | 78.08 | 4.50 | 293.25 |
| 350 | 0.00 | 76.09 | 4.50 | 293.25 |
| 355 | 0.00 | 74.20 | 4.50 | 293.25 |

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: September 25, 2018

Exhibit B

WAIVER REQUEST OF TABLE OF ALLOCATION FOR GENERAL ATOMICS ORBITAL TEST BED SATELLITE

The U.S. Table of Frequency Allocations¹ allocates the 2025-2100 MHz band for Fixed, Mobile, and Federal use. The 2200-2290 MHz is allocated to Federal services (Space Operations, Earth Exploration-Satellite, Fixed, Mobile, and Space Research). To the extent necessary, Intelsat seeks waiver to permit its 7.3m S-band antenna in Paumalu, Hawaii to communicate with the General Atomics Orbital Test Bed (“OTB”) satellite during its launch and early orbit phase (“LEOP”) and during in-orbit testing (“IOT”).

The Commission may grant a waiver for good cause shown.² The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.³ 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.⁴ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest. As shown below, good cause exists here to grant a waiver allowing Intelsat’s 7.3m S-band antenna to provide telemetry, tracking, and control (“TT&C”) services to the OTB satellite using frequencies in the 2025-2100 MHz and 2200-2290 MHz bands.

Good cause exists to waive the Table of Allocations for 2025-2100 MHz and 2200-2290 MHz frequency bands. Intelsat seeks to use its 7.3m S-band antenna to support the launch and early orbit phase (“LEOP”) and TT&C during in-orbit testing of the OTB satellite. OTB will launch as part of the U.S. Air Force’s Space Technology Program (STP-2) and will carry the National Aeronautics and Space Administration’s Deep Space Atomic Clock, the U.S. Air Force’s Modular Solar Array, and other payloads.⁵ To support the mission Intelsat’s antenna will be utilized for TT&C passes 1-4 times per day ranging from 8-10 minutes in duration each at times when the OTB satellite is visible to Intelsat’s antenna to safely place OTB in non-geostationary orbit and TT&C the spacecraft during IOT for approximately 75 days.

Moreover, grant of this waiver is consistent with the Commission’s precedent. A waiver of the Table of Allocations is generally granted “when there is little potential interference into any service authorized under the Table of Frequency allocations and when the nonconforming

¹ See 47 C.F.R. § 2.106.

² 47 C.F.R. §1.3.

³ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

⁴ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

⁵ See http://www.ga.com/websites/ga/images/products/defense/space-systems/OTB_Satellite_DS_0818E.pdf for more information.

operator accepts any interference from authorized services.”⁶ In the 2025-2100 MHz band, the 7.3m S-band antenna in Paumalu, Hawaii antenna will only transmit intermittently over a 75-day period. Additionally, the antenna will not transmit in 2200-2290 MHz band and Intelsat agrees to accept any level of interference into this earth stations from Federal users in the band. Finally, grant of the requested waiver in the would be consistent with prior Commission precedent allowing for use of the 2200-2290 MHz band on a temporary basis.⁷

⁶ See *The Boeing Company*, Order and Authorization, 16 FCC Rcd 22645, 22651 (Int’l Bur. & OET 2001); *Application of Fugro-Chance, Inc. for Blanket Authority to Construct and Operate a Private Network of Receive-Only Mobile Earth Stations*, Order and Authorization, 10 FCC Rcd 2860 (Int’l Bur. 1995) (authorizing MSS in the C-band); see also *Application of Motorola Satellite Communications, Inc. for Modification of License*, Order and Authorization, 11 FCC Rcd 13952-13956 (Int’l Bur. 1996) (authorizing service to fixed terminals in bands allocated the mobile satellite service).

⁷ See *Policy Branch Information; Actions Taken*, Report No. SES-02071, File No. SES-STA-20180530-01000 (June 20, 2018) (Public Notice); *Satellite Communications Services Information; Actions Taken*, Report No. SES-02090, File No. SES-STA-20180711-01659 (Aug. 22, 2018) (Public Notice).