

Approved by OMB
3060-0678

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Request for Further Extension STA to Continue Operating 7.3m S-band Antenna at Paumalu, Hawaii

1. Applicant

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

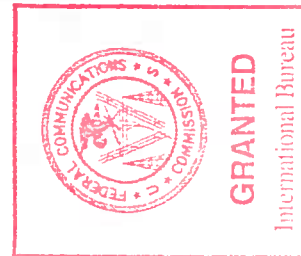
File # SES-STA-20181022-03183

Call Sign N/A Grant Date 5/10/2019
(or other identifier)

Term Dates

From 5/10/2019 To: 6/10/2019

Approved: [Signature]



2. Contact				
Name:	Cynthia J. Grady	Phone Number:	202-559-6949	
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 type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input checked="" type="radio"/> Other				
6. Requested Use Prior Date				
7. City/Paumalu				
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: Attachment 3:	
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 an additional 30 days of STA previously granted to Intelsat to utilize a 7.3m S-band antenna located at its Paumalu, Hawaii teleport to provide TT&C restoration services for the EUTELSAT-WA (S3031) satellite during its drift to, and operation at, 132.85 W.L.</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. <div style="text-align: right;"> <input checked="" type="radio"/> Yes <input type="radio"/> No </div>	
14. Name of Person Signing Cynthia J. Grady	15. Title of Person Signing Senior Counsel, Intelsat US LLC
<p>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).</p>	

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 License LLC
File No: SES-STA-20181022-03183
Call Sign: None



File # SES-STA-20181022-03183

Call Sign N/A Grant Date 5/10/2019
(or other identifier)

Term Dates
From 5/10/2019 To: 6/10/2019

Approved: Paul E. Hays

Intelsat License LLC ("Intelsat") is granted of special temporary Authority ("STA") to operate its 7.3m S-band antenna in Paumalu, HI to test telemetry, tracking, and command (TT&C) restoration services for the EUTELSAT-WA (S3031) satellite at 132.85° W.L. on center frequencies 2085.688 MHz (Earth-to-space) and 2265.0 MHz (space-to-Earth) under the following conditions:

1. Operations shall be on an unprotected, non-interference basis with respect to other authorized stations, including federal stations.
2. Uplink operation from Paumalu, HI ground station to EUTELSAT-WA (S3031) shall not occur when the NASA International Space Station (ISS) (NORAD designation 25544 or international spacecraft ID 1998-067A) is within 10 degrees of Paumalu, HI ground station antenna boresight.
3. Operations using 2085.688 MHz or 2265.0 MHz shall be pre-coordinated with the NASA GSFC Spectrum Manager, Scott Galbraith at 301-286-5089 or VINCENT.S.GALBRAITH@NASA.GOV, at least 7 days prior to operation.
4. Due to potential harmful interference to naval activities, Intelsat License LLC RF operations plan shall be submitted as soon as possible to the Naval Surface Warfare Center, Dahlgren Division (NSWCDD), Mr. James Moneyhon (540) 653-3477, or james.moneyhon@navy.mil, for assessment.
5. Any future requests or extensions will need to submit applications to the FCC to be re-coordinated with NTIA.
6. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat's risk.
7. Operations with the EUTELSAT-WA (S3031) satellite from the expiration of SES-STA-20180912-02660 to the beginning of this authorization were authorized under 47 CFR § 1.62.

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.



INTELSAT.

Envision. Connect. Transform.

October 16, 2018

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

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

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat to utilize a 7.3m S-band antenna located at its Paumalu, Hawaii teleport to provide telemetry, tracking, and command ("TT&C") restoration services for the EUTELSAT-WA (S3031)² satellite during its drift to, and operation at, 132.85° W.L.³ EUTELSAT-WA is now on-station at 132.85° W.L. Restoration services include bi-annual testing, which will last approximately two hours per test, and TT&C services in the event the satellite's primary Ku-band TT&C experiences an anomaly.

The EUTELSAT-WA operations will continue to be performed in the following frequencies: 2085.688 MHz in the uplink (RHCP and LHCP) and 2265.0 MHz in the downlink (RHCP and LHCP). The drift operations will be coordinated with all operators of satellites that use the same frequency bands.⁴ 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.

The 24x7 contact information for the EUTELSAT-WA TT&C operations is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary)

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 See *Policy Branch Information; Actions Taken*, Report No. SAT-01309, File No. SAT-PPL-20180302-00018 (Apr. 6, 2018) (Public Notice).

³ See Intelsat License LLC, Request for STA Extension to Continue Operating 7.3m S-band Antenna at Paumalu, Hawaii, File No. SES-STA-20180912-02660 (stamp grant issued Sept. 21, 2018 by Paul Blais); *Satellite Communications Services Information; Actions Taken*, Report No. SES-02090, File No. SES-STA-20180711-01659 (Aug. 22, 2017) (Public Notice).

⁴ Telespazio, the manager of the EUTELSAT-WA mission, will handle the coordination.

(310) 525-5591 – West Coast Operations Center (back-up)

Request to speak with Harry Burnham or Kevin Bell.

In further support of this further extension request, Intelsat incorporates by reference Exhibit A from its original request, which contains 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.

The U.S. Table of Frequency Allocations⁵ 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). In order to ensure Intelsat can provide TT&C restoration services in these bands, Intelsat requests waiver of the U.S. Table of Frequency Allocations to permit its 7.3m S-band antenna in Paumalu, Hawaii to communicate with EUTELSAT-WA for the limited purpose of emergency TT&C restoration.

The Commission may grant a waiver for good cause shown.⁶ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁷ 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.⁸ 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 to allow Intelsat's 7.3m S-band antenna to provide TT&C restoration services for EUTELSAT-WA using three small carriers within the 2025-2100 MHz and 2200-2290 MHz bands. Additionally, the anticipated operation of these carriers will be for a few hours of testing annually, as prolonged transmission would only occur in cases of spacecraft anomaly.

Good cause exists to waive the Table of Allocations for 2025-2100 MHz and 2200-2290 MHz frequency bands. The EUTELSAT-WA satellite is designed with its contingency TT&C frequencies in S-band, consistent with the allocation of ITU Region 1, where the satellite previously operated. As the spacecraft is now in orbit, it is not possible to change the contingency TT&C frequencies.

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 operator accepts

⁵ See 47 C.F.R. § 2.106.

⁶ 47 C.F.R. §1.3.

⁷ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

⁸ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

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October 16, 2018
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any interference from authorized services.”⁹ As noted above, in the 2025-2100 MHz band, the Paumalu, Hawaii S-band antenna will transmit only a few hours per year unless there is an anomaly on the spacecraft. In the event an anomaly occurs, all efforts will be made to immediately regain use of the Ku-band TT&C. Additionally, in 2200-2290 MHz band, Intelsat agrees to accept any level of interference into this earth station from Federal users in the band.¹⁰

Grant of this STA further extension request will allow Intelsat to continue to be able to provide emergency restoration TT&C services to the EUTELSAT-WA spacecraft, which will ensure safe station-keeping of the satellite and thereby promotes the public interest.

Please direct any questions regarding this STA further extension 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

⁹ 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).

¹⁰ The Commission previously has authorized temporary commercial use of 2200-2290 MHz on this basis. See *Policy Branch Information; Actions Taken*, Report No. SES-02071, File No. SES-STA-20180530-01000 (June 20, 2018) (Public Notice).