

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 to Operate a New Remote VSAT Terminal with the Intelsat Mountainside, Maryland VSAT Hub, Call Sign E110013

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		

60 days "with conditions"

File # SES-STA-20181130-03355

Call Sign E110013 Grant Date 12/07/2018
(or other identifier)

Term Dates

From: 12/11/2018 To: 02/09/2019

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 -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 SESMOD2018091202820 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 CGV - Fixed Satellite VSAT System	
5. Type Request	
<input checked="" type="radio"/> Use Prior to Grant <input type="radio"/> Change Station Location <input type="radio"/> Other	
6. Requested Use Prior Date	
7. City Hagerstown	
8. Latitude (dd mm ss.s h) 39 42 0.0 N	

9. State MD	10. Longitude (dd mm ss.h) 77 44 0.0 W
11. Please supply any need attachments. Attachment 1: STA Request Attachment 2: Exhibit A 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.) Intelsat License LLC herein requests grant of Special Temporary Authority for 30 days, commencing December 11, 2018, to temporarily operate a new Ku-band remote VSAT terminal with its Mountainside, Maryland VSAT hub, Call Sign E110013, in order to communicate with Galaxy 3C at 95.0 W.L. for a customer demonstration.	
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";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).	

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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 Number: SES-STA-20181130-03355
Call Sign: E110013
Special Temporary Authority (STA)

Intelsat License LLC ("Intelsat") is granted a 60-day STA, commencing December 11, 2018, to operate a temporary 1.2m Ku-band terminal located in Round Hill, VA with its VSAT hub (Call Sign E110013) located at geographic coordinates 39° 35' 57.00"N, 77° 45' 22.8"W in Mountainside, MD via Galaxy 3C (Call Sign S2381) satellite at orbital location 95.05°W on 14143-14197 MHz (Earth to-space) and 11843-11897 MHz (space-to-Earth) frequency bands for customer demonstration. Operations shall be under the following conditions:

- 1) Operations shall comply with Section 25.212(c)(2) of the Commission's rules, 47 C.F.R. § 25.212(c)(2).
- 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 must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
- 4) The licensee shall take all necessary measures to ensure that antennas in operation do 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 wherever such exposures might occur. 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 www.fcc.gov/oet/rfsafety) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alert signs and protective equipment for workers.
- 5) Currently the 24x7 contact information for the Galaxy 3C 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.
- 6) Grant of this authorization is without prejudice to any determination that the Commission may make regarding Intelsat's pending application FCC IBFS File number SES-MOD-20180912-02820 or future applications.

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


60 days *"With conditions"*

File # 5E5-STA-20181130-03355

Call Sign E110013 Grant Date 12/07/2018
(or other identifier)

Term Dates
From: 12/11/2018 To: 02/09/2019

Approved: *Karl E. Hales*



GRANTED
International Bureau



E110013 SES-STA-20181130-03355 IB2018010410
Intelsat License LLC

November 30, 2018

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

Re: Request for Special Temporary Authority to Operate a New Remote VSAT Terminal with Intelsat's Mountainside, Maryland VSAT Hub, Call Sign E110013

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests grant of Special Temporary Authority ("STA")¹ for 30 days, commencing December 11, 2018, to temporarily operate a new Ku-band remote VSAT terminal with Intelsat's Mountainside, Maryland VSAT hub, Call Sign E110013,² in order to communicate with Galaxy 3C³ at 95.0° W.L. for a customer demonstration. The VSAT terminal will be located in Round Hill, Virginia and the proposed demonstration is expected to take approximately 30-60 days.

The demonstration will be performed in the following frequency bands: 14143-14197 MHz in the uplink; and 11843-11897 MHz in the downlink. The proposed operations at 95.0° W.L. will be consistent with Intelsat's coordination agreements for the nominal 95.0° W.L. location. The 24x7 contact information for the Galaxy 3C operations are as follows:

¹ Intelsat has filed this STA request, an FCC Form 159, and a \$210.00 filing fee electronically via the International Bureau's Filing System.

² See *Satellite Communications Services Information; Actions Taken*, Report No. SES-01336, File No. SES-LIC-20110210-00136 (Apr. 6, 2011) (Public Notice). See also *Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-02109, File No. SES-MOD-2018912-02820 (Oct. 31, 2018) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01254, File No. SAT-MOD-20170523-00077 (July 21, 2017) (Public Notice).

Ms. Marlene Dortch
November 30, 2018
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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 attaches Exhibit A, a Radiation Hazard Report. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its remote terminal, Intelsat will take all reasonable steps to eliminate the interference.

The proposed temporary operation of a new remote VSAT terminal will help demonstrate services to a potential customer. Accordingly, grant of this STA request is in the public interest.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Paul Blais

Radiation Hazard Report

Analysis of Non-Ionizing Radiation for a 1.2 m Earth Station

This analysis provides the calculated non-ionizing radiation levels for a 1.2-meter earth station system.

The methods and calculations performed in this analysis are based on the FCC Office of Engineering and Technology Bulletin, No.65, October 1985 as revised in 1997 in Edition 97-01. The radiation safety limits used in the analysis are in conformance with the FCC R&O 96-326 (Summarized in Annex 1). There are separate exposure limits applicable to the General Population/Uncontrolled Environment and the Occupational/Controlled Environment. The Maximum Permissible Exposure (MPE) limits for persons in a General Population/Uncontrolled environment for the frequency band of this antenna, is 1 mW/cm² for a 30 minute or lower time period as shown in Annex 1 (a). The MPE limit for persons in an Occupational/Controlled environment for the frequency band of this antenna is 5 mW/cm² for a 6 minute time or lower period as shown in Annex 1 (b). The purpose of this analysis described is to determine the power flux density levels of the earth station at the main reflector surface, the near-field, transition region, far-field, between the sub-reflector or feed and, at the main reflector surface, and between the antenna edge and the ground and to compare these levels to the specified MPEs.

The parameters of the antenna that is the subject of this analysis are shown in Table 1. Intermediate calculated values and constants are provided in Table 2.

Table 1. Input Parameters Used for Determining Power Flux Densities

Parameter	Symbol	Formula	Value	Units
Antenna Diameter	D	Input	1.2	m
Frequency	F	Input	14170	MHz
Transmit Power	P	Input	3	W
Antenna Gain (dBi)	G _{es}	Input	43.3	dBi

Table 2. Calculated Values and Constants

Parameter	Symbol	Formula	Value	Units
Antenna Surface Area	A _{surface}	$\pi D^2/4$	1.13	m ²
Wavelength	λ	300/F	0.021171	m
Antenna Gain (factor)	G	10 ^{G_{es}/10}	21379.62	n/a
Pi	π	Constant	3.1415927	n/a
Antenna Efficiency	η	$G\lambda^2 / (\pi^2 D^2)$	0.67	n/a

1. Antenna Main Reflector Surface

The power density in the main reflector is determined from the Power level and the area of the main reflector aperture. This is determined from the following equation:

Power Density at the Main Reflector Surface:

$$\begin{aligned} S_{\text{surface}} &= 4P/A_{\text{surface}} && (1) \\ &= 10.610 \text{ W/m}^2 \\ &= 1.061 \text{ mW/cm}^2 \end{aligned}$$

2. Near Field Calculation

Power Flux density is considered to be at a maximum value throughout the entire length of the defined Near Field region. The region is contained within a cylindrical volume having the same diameter as the antenna. Past the boundary of the Near Field region, the power density from the antenna decreases linearly with respect to increasing distance. The distance to the end of the Near Field is determined from the following equation:

Extent of the Near Field:

$$\begin{aligned} R_{\text{nf}} &= D^2 / (4\lambda) && (2) \\ &= 17.00 \text{ m} \end{aligned}$$

The maximum power density in the Near Field is determined from the following equation:

Near Field Density:

$$\begin{aligned} S_{\text{nf}} &= 16.0 \eta P / (\pi D^2) && (3) \\ &= 0.715 \text{ mW/cm}^2 \end{aligned}$$

3. Transition Region Calculation

The Transition Region is located between the Near and Far Field regions. The power density begins to decrease linearly with increasing distance in the Transition region. While the power density decreases inversely with distance in the Transition region, the power density decreases inversely with the square of the distance in the Far Field region. The power density calculated in Section 1 is the highest power density the antenna can produce in any of the regions away from the antenna. The power density at a distance R_t is determined from the following equation:

Transition Region Power Density:

$$\begin{aligned} S_t &= S_{\text{nf}} R_{\text{nf}} / R_t && (4) \\ &= 0.715 \text{ mW/cm}^2 \end{aligned}$$

4. Far Field Distance Calculation

The distance to the Far Field Region is calculated using the following equation:

Distance to Far Field Region:

$$\begin{aligned} R_{ff} &= 0.6 D^2 / \lambda \\ &= 40.810 \text{ m} \end{aligned} \quad (5)$$

The maximum main beam power density in the far field is determined from the following equation:

On-axis Power Density in the Far Field:

$$\begin{aligned} S_{ff} &= G P / (4 \pi R_{ff}^2) \\ &= 0.306 \text{ mW/cm}^2 \end{aligned} \quad (6)$$

5. Region between the Main Reflector and the Ground

Assuming uniform illumination of the reflector surface, the power density between the antenna and the ground is determined from the following equation:

Power Density between Reflector and Ground:

$$\begin{aligned} S_g &= P / A_{\text{surface}} \\ &= 0.265 \text{ mW/cm}^2 \end{aligned} \quad (7)$$

7. Summary of Calculations

Table 3. Summary of Expected Radiation levels for Uncontrolled Environment

Region	Symbol	Calculated Maximum Radiation Power Density Level (mW/cm ²)	Hazard Assessment
1. Main Reflector	S_{surface}	1.061	Potential Hazard
2. Near Field (R _{nf} = 17 m)	S_{nf}	0.715	Satisfies FCC MPE
3. Transition Region (R _{nf} < R _t < R _{ff})	S_t	0.715	Satisfies FCC MPE
4. Far Field (R _{ff} = 40.81 m)	S_{ff}	0.306	Satisfies FCC MPE
5. Between Main Reflector and Ground	S_g	0.265	Satisfies FCC MPE

Table 4. Summary of Expected Radiation levels for Controlled Environment

Region	Symbol	Calculated Maximum Radiation Power Density Level (mW/cm ²)	Hazard Assessment
1. Main Reflector	S_{surface}	1.061	Satisfies FCC MPE
2. Near Field (R _{nf} = 17 m)	S_{nf}	0.715	Satisfies FCC MPE
3. Transition Region (R _{nf} < R _t < R _{ff})	S_t	0.715	Satisfies FCC MPE
4. Far Field (R _{ff} = 40.81 m)	S_{ff}	0.306	Satisfies FCC MPE
5. Between Main Reflector and Ground	S_g	0.265	Satisfies FCC MPE

It is the applicant's responsibility to ensure that the public and operational personnel are not exposed to harmful levels of radiation.

8. Conclusion

Based upon the above analysis, it is concluded that harmful levels of radiation may exist in those regions noted for the Uncontrolled (Table 3) Environment and the Controlled Environment (Table 4).

The antenna will be vehicle-mounted and will be located in Mclean, VA.

The antenna is in a facility with secured access in and around the proposed antenna. The earth station will be marked with the standard radiation hazard warnings, as well as the area in the vicinity of the earth station to inform those in the general population, who might be working or otherwise present in or near the direct path of the main beam.

The applicant will ensure that the main beam of the antenna will be pointed at least one diameter away from any building, or other obstacles in those area that exceed the MPE levels. Since one diameter removed from the center of the main beam the levels are down by at least 20 dB, or by a factor of 100, these potential hazards do not exist for either the public, or for earth station personnel.

Finally, the earth station's operating personnel will not have access to areas that exceed the MPE levels, while the earth station is in operation. The transmitter will be turned off during those periods of maintenance, so that the MPE standard of 5.0 mW/cm^2 will be complied with for those regions in close proximity to the main reflector, which could be occupied by operating personnel.

"The licensee shall take all necessary measures to ensure that the antenna 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 wherever such exposures might occur. 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 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."

ANNEX 1
(MPE Levels)

a) Limits for General Population/Uncontrolled Exposure (MPE)

Frequency Range (MHz)	Power Density (mW/cm²)
30-300	0.2
300-1500	Frequency(MHz)*(4.0/1200)
1500-100,000	1

b) Limits for Occupational/Controlled Exposure (MPE)

Frequency Range (MHz)	Power Density (mW/cm²)
30-300	1
300-1500	Frequency(MHz)*(4.0/1200)
1500-100,000	5