



INTELSAT.

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December 31, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Requests for Special Temporary Authority
Fillmore, California Earth Station E4132
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 January 21, 2019, to use its Fillmore, California C-band earth station (Call Sign E4132) and its Riverside, California earth station (Call Sign E040125) to provide launch and early orbit phase (“LEOP”) services for the GSAT-31 satellite. GSAT-31 is expected to launch on January 21, 2019.² IntelSat expects the LEOP period to last approximately 10 days.

The GSAT-31 LEOP operations will be performed at the following frequencies: 6415.000 MHz and 6423.496 MHz (CP) in the uplink; and 4188.768 MHz and 4196.928 MHz (CP) 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 GSAT-31 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 \$210.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

² The in-orbit testing and final location for GSAT-31, which IntelSat understands is licensed by India, will be 48.0° E.L.

³ Indian Space Research Organisation (“ISRO”), the manager of the GSAT-31 mission, will handle the coordination.

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In further support of this request, Intelsat herewith attaches Exhibits A-C, which contain coordination reports 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 GSAT-31 LEOP mission, ISRO will serve as the mission manager. 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 perform the ranging sessions by sending a tone to the spacecraft periodically. 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 GSAT-31 satellite. This will help provide services at the 48.0° E.L. location 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