

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 30-Day STA Using Fillmore, CA Earth Station E4132 to Provide LEOP Services for GSAT-31

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 | | |



File # SES-STA-2019 0102-00001
Call Sign E4132 Grant Date 1/3/2019
(or other identifier)
Term Dates
From 1/24/2019 To: 3/20/2019
Approved: Paul E. Hays

Applicant: Intelsat License LLC
Call Sign: E4132
File No.: SES-STA-20190102-00001
Special Temporary Authority ("STA")



File # SES-STA-20190102-00001
Call Sign E4132 Grant Date 1/3/2019
(or other identifier)
Term Dates
From 1/21/2019 To 2/20/2019
Approved: Paul E. Blakes

Intelsat License LLC is granted special temporary authority for 30 days, beginning January 21, 2019, to operate its Fillmore, CA earth stations to provide launch and early orbit phase (LEOP) services for the GSAT-31 satellite, licensed by India, on center frequencies: 6415.000 MHz and 6423.496 MHz (Earth-to-space); and 4188.768 MHz and 4196.928 MHz (space-to-Earth) under the following conditions.

1. All operations shall be on an unprotected and non-harmful interference basis, Intelsat License LLC, 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 and must inform the Commission, in writing, immediately of such an event.
2. All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached when harmful interference occurs. Currently the 24x7 contact information for the drift 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.
3. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending or future Intelsat License LLC applications.
4. 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 upon release.

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 or Submission ID

4a. Is a fee submitted with this application?

☒ If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

☐ Governmental Entity ☐ Noncommercial educational licensee

☐ Other (please explain):

4b. Fee Classification CGX – Fixed Satellite Transmit/Receive Earth Station

5. Type Request

☐ Use Prior to Grant

☐ Change Station Location

☒ Other

6. Requested Use Prior Date

7. City Fillmore

8. Latitude

(dd mm ss.s h) 34 24 22.0 N

| | |
|---|--|
| 9. State CA | 10. Longitude (dd mm ss.s h) 118 53 34.0 W |
| 11. Please supply any need attachments. Attachment 1: Exhibit A Attachment 2: Exhibit B Attachment 3: Exhibit C | |
| 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 January 21, 2019, to use its Fillmore, California C-band earth station (Call Sign E4132) to provide launch and early orbit phase services for the GSAT-31 satellite. GSAT-31 is expected to launch on January 21, 2019.</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. <input checked="" type="radio"/> Yes <input type="radio"/> No | |
| 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

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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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.

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.

Ms. Marlene H. Dortch
December 31, 2018
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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

Prepared By

COMSEARCH

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

Prepared For

Intelsat License LLC
Fillmore, California

Temporary Transmit-Only Earth Station
Operation Dates: 01/29/2019 - 02/20/2019

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 November 29, 2018.

Company

ABC Holding Company Inc.
AT&T Mobility Spectrum LLC - N CA
AT&T Mobility Spectrum LLC - Southern CA
Air Sites 2000 LLC
American Tower, LLC
Anaheim City, of
Arizona Public Service Company (APS)
BNS Electronics, Inc.
CCO SoCal I, LLC
California Internet Solutions, Inc.
California Internet, L.P.
California Internet, L.P.
California Resources Corporation
California State University, Northridge
California, State of
Calvary Chapel of Costa Mesa
City of Los Angeles Dept Water & Power
City of Montebello
Coast Community College District
Communication Services Inc.
Conterra Ultra Broadband, LLC
DM Ventures, Inc. dba Warp2Biz
Entravision Holdings, LLC
Exxon Communications Company
Federal Communication Commission
Fresno MSA Limited Partnership
Frontier California Inc.
Frontier Communications of the Southwest
GTE Mobilnet of Santa Barbara LTD Ptnsh
Glendale City California
Global Telecom & Technology Americas, In
Go Creative Wireless
GovNET Licenses LLC
ION Media Los Angeles License, Inc.
KTLA, LLC

Kern County Superintendent of Schools
 Kern Ed Telecom Consortium
 Kern, County of
 LDM Engineering
 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
 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 - SE Cal
 Nextel License Holdings 4 Inc.
 Nextel of California Inc.
 Nextweb Inc
 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
 Regents of the University of California
 Riverside, County of
 San Bernardino County of California
 San Diego Broadband
 San Diego Gas & Electric Company
 Santa Barbara Cellular Systems, Ltd.
 Santa Barbara, County of
 Sentinel Peak Resources California LLC
 Skyriver Communications
 Southern California Edison Company
 Southern California Gas Company
 Southern California Regional Rail Auth.
 T-Mobile License LLC
 TV Microwaves Company
 Turn Wireless, LLC
 Ultimate Internet Access, Inc
 Union Pacific Railroad Company
 University of California, HPWREN
 Ventura, County of
 Verizon Wireless (VAW) LLC (Southern CA)
 Verizon Wireless (VAW) LLC-N CA/NV
 Verizon Wireless(VAW) LLC-AZ/CO/NM/NV/UT
 West Covina, City of
 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: 11/29/2018
Job Number: 181129COMSGE09

Administrative Information

Status: TEMPORARY (Operation from 01/29/2019 to 02/20/2019)
Call Sign: TEMP02
Licensee Code: INTELS
Licensee Name: Intelsat License LLC

Site Information

FILLMORE, CA
Venue Name
Latitude (NAD 83): 34° 24' 22.0" N
Longitude (NAD 83): 118° 53' 34.0" W
Climate Zone: A
Rain Zone: 4
Ground Elevation (AMSL): 331.09 m / 1086.3 ft

Link Information

Satellite Type: Geostationary
Mode: TO - Transmit-Only
Modulation: Digital
Satellite Arc: 45.6° W to 192.2° West Longitude
Azimuth Range: 99.6° to 260.4°
Corresponding Elevation Angles: 5.1° / 5.0°
Antenna Centerline (AGL): 8.23 m / 27.0 ft

Antenna Information

Transmit - FCC32
Manufacturer: Scientific-Atlanta
Model: 3311
Gain / Diameter: 53.8 dBi / 10.3 m
3-dB / 15-dB Beamwidth: 0.40° / 0.60°

Max Available RF Power (dBW/4 kHz): 10.9
(dBW/MHz): 34.9

Maximum EIRP (dBW/4 kHz): 64.7
(dBW/MHz): 88.7

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

Frequency Information

Transmit 6.1 GHz
Emission / Frequency Range (MHz): 850KFXD / 6415.0
850KFXD / 6423.496

Max Great Circle Coordination Distance: 543.9 km / 337.9 mi
Precipitation Scatter Contour Radius: 396.3 km / 246.2 mi

| | | |
|------------------------------------|-------------------------------|---------|
| Coordination Values | FILLMORE, CA | |
| Licensee Name | Intelsat License LLC | |
| Latitude (NAD 83) | 34° 24' 22.0" N | |
| Longitude (NAD 83) | 118° 53' 34.0" W | |
| Ground Elevation (AMSL) | 331.09 m / 1086.3 ft | |
| Antenna Centerline (AGL) | 8.23 m / 27.0 ft | |
| Antenna Model | Scientific-Atlanta 10.3 meter | |
| Antenna Mode | Transmit 6.1 GHz | |
| Interference Objectives: Long Term | -154.0 dBW/4 kHz | 20% |
| Short Term | -131.0 dBW/4 kHz | 0.0025% |
| Max Available RF Power | 10.9 (dBW/4 kHz) | |

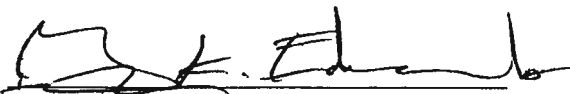
| Azimuth (°) | Horizon Elevation (°) | Antenna Discrimination (°) | Transmit 6.1 GHz | |
|-------------|-----------------------|----------------------------|--------------------|----------------------------|
| | | | Horizon Gain (dBi) | Coordination Distance (km) |
| 0 | 9.23 | 99.59 | -10.00 | 100.00 |
| 5 | 10.68 | 94.61 | -10.00 | 100.00 |
| 10 | 11.53 | 89.63 | -10.00 | 100.00 |
| 15 | 9.69 | 84.65 | -10.00 | 100.00 |
| 20 | 7.91 | 79.64 | -10.00 | 100.00 |
| 25 | 9.98 | 74.69 | -10.00 | 100.00 |
| 30 | 9.81 | 69.70 | -10.00 | 100.00 |
| 35 | 10.40 | 64.75 | -10.00 | 100.00 |
| 40 | 10.04 | 59.75 | -10.00 | 100.00 |
| 45 | 9.30 | 54.74 | -10.00 | 100.00 |
| 50 | 8.25 | 49.70 | -10.00 | 100.00 |
| 55 | 7.02 | 44.66 | -9.25 | 100.00 |
| 60 | 8.47 | 39.75 | -7.98 | 100.00 |
| 65 | 9.70 | 34.90 | -6.57 | 100.00 |
| 70 | 9.19 | 29.89 | -4.89 | 100.00 |
| 75 | 8.53 | 24.86 | -2.89 | 100.00 |
| 80 | 7.11 | 19.73 | -0.38 | 104.16 |
| 85 | 5.27 | 14.63 | 2.87 | 134.89 |
| 90 | 4.58 | 9.64 | 7.40 | 168.11 |
| 95 | 5.46 | 4.65 | 15.32 | 200.33 |
| 100 | 4.77 | 0.47 | 40.28 | 534.66 |
| 105 | 3.79 | 5.08 | 14.34 | 218.62 |
| 110 | 3.63 | 9.18 | 7.93 | 188.91 |
| 115 | 2.67 | 13.72 | 3.57 | 187.70 |
| 120 | 2.31 | 17.83 | 0.72 | 181.94 |
| 125 | 1.52 | 22.14 | -1.63 | 191.55 |
| 130 | 2.21 | 25.42 | -3.13 | 163.38 |
| 135 | 2.38 | 28.89 | -4.52 | 152.60 |
| 140 | 2.46 | 32.24 | -5.71 | 145.55 |
| 145 | 2.77 | 35.22 | -6.67 | 135.39 |
| 150 | 2.42 | 38.43 | -7.62 | 138.56 |
| 155 | 2.83 | 40.74 | -8.25 | 129.72 |
| 160 | 2.84 | 42.99 | -8.83 | 127.54 |
| 165 | 3.34 | 44.34 | -9.17 | 117.24 |
| 170 | 2.95 | 46.01 | -9.57 | 122.76 |
| 175 | 2.90 | 46.86 | -9.77 | 122.93 |
| 180 | 2.60 | 47.42 | -9.90 | 127.98 |
| 185 | 2.02 | 47.72 | -9.97 | 137.59 |

| | | |
|------------------------------------|-------------------------------|---------|
| Coordination Values | FILLMORE, CA | |
| Licensee Name | Intelsat License LLC | |
| Latitude (NAD 83) | 34° 24' 22.0" N | |
| Longitude (NAD 83) | 118° 53' 34.0" W | |
| Ground Elevation (AMSL) | 331.09 m / 1086.3 ft | |
| Antenna Centerline (AGL) | 8.23 m / 27.0 ft | |
| Antenna Model | Scientific-Atlanta 10.3 meter | |
| Antenna Mode | Transmit 6.1 GHz | |
| Interference Objectives: Long Term | -154.0 dBW/4 kHz | 20% |
| Short Term | -131.0 dBW/4 kHz | 0.0025% |
| Max Available RF Power | 10.9 (dBW/4 kHz) | |

| Azimuth (°) | Horizon Elevation (°) | Antenna Discrimination (°) | Transmit 6.1 GHz | |
|-------------|--------------------------|-------------------------------|-----------------------|-------------------------------|
| | | | Horizon Gain (dBi) | Coordination Distance (km) |
| 190 | 2.12 | 46.80 | -9.76 | 136.42 |
| 195 | 0.87 | 46.57 | -9.70 | 177.31 |
| 200 | 0.26 | 45.15 | -9.37 | 218.70 |
| 205 | 0.93 | 42.25 | -8.65 | 178.89 |
| 210 | 0.65 | 39.75 | -7.98 | 196.23 |
| 215 | 0.87 | 36.59 | -7.08 | 188.98 |
| 220 | 0.00 | 33.92 | -6.26 | 239.30 |
| 225 | 0.00 | 30.45 | -5.09 | 244.97 |
| 230 | 0.00 | 26.83 | -3.72 | 251.22 |
| 235 | 0.00 | 23.09 | -2.08 | 259.79 |
| 240 | 0.00 | 19.24 | -0.11 | 270.78 |
| 245 | 0.00 | 15.33 | 2.36 | 285.44 |
| 250 | 0.00 | 11.35 | 5.63 | 306.52 |
| 255 | 0.00 | 7.37 | 10.31 | 339.69 |
| 260 | 0.00 | 5.06 | 14.40 | 543.90 |
| 265 | 0.00 | 6.84 | 11.13 | 345.83 |
| 270 | 0.00 | 10.85 | 6.11 | 309.81 |
| 275 | 0.92 | 15.18 | 2.47 | 228.88 |
| 280 | 1.16 | 19.99 | -0.52 | 205.60 |
| 285 | 2.42 | 24.75 | -2.84 | 159.54 |
| 290 | 4.00 | 29.64 | -4.80 | 121.87 |
| 295 | 3.78 | 34.64 | -6.49 | 119.28 |
| 300 | 4.19 | 39.63 | -7.95 | 107.36 |
| 305 | 3.71 | 44.64 | -9.24 | 110.28 |
| 310 | 3.07 | 49.65 | -10.00 | 118.78 |
| 315 | 2.67 | 54.65 | -10.00 | 126.28 |
| 320 | 2.97 | 59.64 | -10.00 | 120.61 |
| 325 | 4.02 | 64.62 | -10.00 | 102.04 |
| 330 | 5.35 | 69.62 | -10.00 | 100.00 |
| 335 | 6.18 | 74.62 | -10.00 | 100.00 |
| 340 | 6.77 | 79.62 | -10.00 | 100.00 |
| 345 | 7.57 | 84.62 | -10.00 | 100.00 |
| 350 | 7.96 | 89.62 | -10.00 | 100.00 |
| 355 | 8.29 | 94.61 | -10.00 | 100.00 |

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: December 17, 2018

Exhibit C

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 analogue 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 GSAT-31 satellite. The information sought by Section 25.114 is

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.

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

⁶ *WAIT Radio v. FCC*, 419 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

Exhibit C
Requests for Special Temporary Authority
Fillmore, California Earth Station E4132
Riverside, California Earth Station E040125
Page 3

Finally, Intelsat notes that it expects to operate with the GSAT-31 satellite using its U.S. earth station for a period of approximately 10 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 10 days, would pose undue hardship without serving underlying policy objectives. Given these particular facts, the waiver sought herein is plainly appropriate.