



**INTELSAT.**

*Envision. Connect. Transform.*

July 5, 2019

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  
Riverside, California Earth Station E060384  
**Expedited Treatment Requested**

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an expedited grant for an additional 60 days, effective July 9, 2019, of the Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to use its Riverside, California Ku-band earth station (Call Sign E060384) to continue providing telemetry, tracking, and command (“TT&C”) services for Intelsat 5 (Call Sign S2704) on-station at 137.0° W.L.<sup>2</sup> Intelsat has filed an application to permanently modify this earth station license.<sup>3</sup>

TT&C operations will continue to be performed in the following frequencies: 14498 MHz (H) and 13999 MHz (RHCP) in the uplink; and 11451 MHz (H, V, and RHCP), 11452 MHz (H, V, and RHCP), and 11454 MHz (RHCP, and LHCP) in the downlink. On-station at 137.0° W.L., Intelsat will continue to operate in conformance with FCC rules and any relevant coordination agreements.

In further support of this request, Intelsat incorporates by reference Exhibits A-D submitted with its original STA request,<sup>4</sup> which contain technical information that demonstrates that the operation of the

---

<sup>1</sup> 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”).

<sup>2</sup> See, e.g., *Satellite Policy Branch Information, Actions Taken*, Report No. SES-02161, File No. SES-STA-20190506-00562 (May 15, 2019) (Public Notice).

<sup>3</sup> See *Intelsat License LLC Modification of Riverside, California Earth Station, Call Sign E060384*, File No. SES-MFS-20190320-00332 (filed Mar. 20, 2019).

<sup>4</sup> See *Satellite Policy Branch Information, Actions Taken*, Report No. SES-02062, File No. SES-STA-20180504-00489 (May 16, 2018) (Public Notice).

earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility, or into Federal systems operating in the 13.75-14.00 GHz band. To provide sufficient interference protection to U.S. Navy shipboard radiolocation operations, Intelsat will continue to operate based on the table provided below for uplink operation in band 13.75-14.00 GHz from Riverside, CA. Using the below mentioned power levels, the earth station's signal flux density toward the shoreline will always be less than -167.0 dBW/m<sup>2</sup>/4KHz. Therefore, there should be no interference to the U.S. Navy radar systems.

<i>Arc</i>	<i>Power</i>
<i>45 to 190 W</i>	<i>76 dBW</i>
<i>45 to 185 W</i>	<i>82 dBW</i>
<i>45 to 180 W</i>	<i>86 dBW</i>
<i>45 to 175 W</i>	<i>88 dBW</i>

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 Intelsat 5 TT&C 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.

Additionally, to the extent necessary, Intelsat requests a waiver of 47 C.F.R. §§ 25.120(a) of the Federal Communications Commission's ("Commission") rules. Section 25.120(a) requires an STA request to be received by the Commission at least three working days prior the start of proposed operations.<sup>5</sup>

Grant of this STA request is in the public interest. The Commission may grant a waiver for good cause shown.<sup>6</sup> The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.<sup>7</sup> 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.<sup>8</sup> Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

---

<sup>5</sup> 47 C.F.R. § 25.120(a).

<sup>6</sup> 47 C.F.R. § 1.3.

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

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

Ms. Marlene H. Dortch

July 5, 2019

Page 3

Good cause exists in this case based on hardship. Due to clerical error Intelsat is unable comply with the requirements of § 25.120(a) of the Commission's rules and, as such, is unable to avail itself of § 1.62 of the Commission's rules,<sup>9</sup> which allows for continued operations while a timely-filed extension application is pending. Waiver will allow Intelsat to continue safely station-keeping the Intelsat 5 satellite without interruption while the permanent modification application is pending and therefor is in the public interest.

Grant of this expedited STA further extension request will allow Intelsat to continue safely station-keep Intelsat 5 at its new location. This, in turn, will help meet a new service demand at the 137.0° W.L. orbital location and thereby promotes the public interest.

Please direct any questions regarding this expedited STA further extension request to (703) 559-6949.

Respectfully submitted,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Senior Counsel  
Intelsat US LLC

cc: Paul Blais

---

<sup>9</sup> 47 C.F.R. § 1.62.