

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 an Additional 30 days of Special Temporary Authority Using a 7.3m S-band Antenna in Paumalu, Hawaii to Provide TT&C, LEOP, IOT, and Drift for STPSat-4 Satellite

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		

30 days "With conditions"

File # SES-STA-20200211-00155

Call Sign N/A Grant Date 03/04/2020
(or other identifier)

Term Dates
From: 03/04/2020 To: 04/02/2020

Approved: [Signature]



GRANTED
International Bureau

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 -
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/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 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.)		Intelsat License LLC herein requests an additional 30 days of Special Temporary Authority to utilize a 7.3m S-band antenna located at is Paumalu, Hawaii teleport to provide telemetry, tracking, and command for the STPSat-4 satellite during launch and early orbit phase, in-orbit testing, drift, and in its final orbit.	
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.		Yes ☒	No ☐
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 No.: SES-STA-20200211-00155
Call Sign: NA
Special Temporary Authority

Intelsat License LLC ("Intelsat") is granted a special temporary authority for 30 days, beginning March 04, 2020, to utilize a 7.3m S-band antenna located at its Paumalu, Hawaii teleport to provide telemetry, tracking, and command ("TT&C") for the STPSat-4 satellite during launch and early orbit phase ("LEOP"), in-orbit testing ("IOT"), drift, and in its final orbit using the following frequencies: 2109.75 MHz (RHCP) (Earth-to-space) and 2277.90 MHz (space-to-Earth) under the following conditions: The services are expected to last approximately one year.

1. Operations will not exceed the operational power levels and parameters.
2. All operations under this grant of special temporary authority shall be on an unprotected and non-harmful interference basis. Intelsat shall not cause harmful interference to and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
3. In the event of any harmful interference under this grant of special temporary authority. Intelsat must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
4. Uplink operations from the Paumalu, HI teleport to the STPSat-4 satellite shall not occur when the NASA International Space Station (ISS) (NORAD designation 25544 or international spacecraft ID 1998- 067A) is within the horizon to horizon view of the Intelsat License LLC facility in Paumalu, HI.
5. All operators of satellites will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs, Currently the 24x7 contact information for Intelsat 39 mission is 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. Any action taken or expense incurred as a result of operations pursuant to this special temporary authority is solely at Intelsat's risk.
7. Grant of this authorization is without prejudice to any determination that the Commission may make regarding pending or future Intelsat applications.
8. Operations of this station during the period from expiration to the grant of this special temporary authority was authorized pursuant to Section 1.62 of the Commission's rules, 47 C.F.R. §1.62.

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.



"With Conditions"

File # SES-STA-20200211-00155

Call Sign N/A Grant Date 03/04/2020
(or other identifier)

Term Dates
From: 03/04/2020 To: 04/02/2020

Approved: Paul E. Hwa



INTELSAT.

Envision. Connect. Transform.

January 29, 2020

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 Intelsat² to utilize a 7.3m S-band antenna located at its Paumalu, Hawaii teleport to provide telemetry, tracking, and command ("TT&C") for the STPSat-4 satellite during launch and early orbit phase ("LEOP"), in-orbit testing ("IOT"), drift, and in its final orbit. The spacecraft is expected to launch/deploy from the International Space Station on or about January 29, 2020. The services are expected to last approximately one year, and Intelsat has filed a 180-day STA request to support these services.³

STPSat-4 is a Department of Defense Space Test Program satellite that hosts a number of experimental payloads including the Air Force Research Laboratory Modular RF Tile L-band Experiment.⁴ STPSat-4 is a non-geosynchronous satellite with an apogee of 400 km and inclination angle of 51.6 degrees. The STPSat-4 operation will be performed using the following frequencies:

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.

² See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02230, File No. SES-STA-20191212-01765 (Jan. 8, 2020) (Public Notice).

³ See *Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-02189, File No. SES-STA-20190711-00912 (Aug. 7, 2019) (Public Notice).

⁴ For more information, see www.nasa.gov/mission_pages/station/research/experiments/explorer/Investigation.html?id=7347.

2109.75 MHz (RHCP; emission designator: 17K2G1D) in the uplink and 2277.90 MHz (RHCP; emission designators: 437KG1D and 875KG1D) in the downlink.

The 24x7 contact information for STPSat-4 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.

In further support of this request, Intelsat incorporates by reference Exhibits A and B of its original request,⁵ which contain 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 and a document supporting STPSat-4 operations.

To the extent necessary, Intelsat seeks waiver of the U.S. Table of Frequency Allocations, which allocates the commercial use 2025-2110 MHz to the fixed and mobile services, and the use of 2200-2290 MHz solely to Federal services.

The Commission may grant a waiver for good cause shown. The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest. 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. 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 allowing Intelsat's 7.3m S-band antenna to operate in order to support STPSat-4's launch, IOT, and operations.

Good cause exists to waive the Table of Allocations for 2025-2110 MHz and 2200-2290 MHz frequency bands. While the commercial allocation in both bands does not include any satellite services, the Federal allocation includes space operation in both bands. Therefore, Intelsat's operations pursuant to grant of this STA will be consistent with the Federal allocations while supporting the Federal operator of STPSat-4 and will not increase the risk on interference.

Finally, Intelsat clarifies that during the STPSat-4 mission, the U.S. Air Force will control the spacecraft. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

⁵ See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02188, File No. SES-STA-20190711-00911 (Aug. 7, 2019) (Public Notice).

Ms. Marlene H. Dortch
January 29, 2020
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Grant of this further STA extension request will allow Intelsat to assist in safely launching, testing, and operating the STPSat-4 satellite, and thereby promotes the public interest.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Paul Blais