

APPLICATION FOR EARTH STATION SPECIAL TEMPORARY AUTHORITY

APPLICANT INFORMATION Enter a description of this application to identify it on the main menu:
Request for Special Temporary Authority Using Castle Rock, Colorado Earth Station KL92

1. Applicant

Name:	Intelsat License LLC	Phone Number:	703-559-7848
DBA Name:		Fax Number:	703-559-8539
Street:	c/o Intelsat Corporation 7900 Tysons One Place	E-Mail:	susan.crandall@intelsat.com
City:	McLean	State:	VA
Country:	USA	Zipcode:	22102
Attention:	Susan H. Crandall		-5972

File #	SES-STA-20150318-00171
Call Sign	KL92
Grant Date	4-14-15
(or other identifier)	
From	4-15-15
Term Dates To	5-14-2015
Approved	<i>[Signature]</i>
Intelsat Bureau	

Applicant: Intelsat License LLC
Call Sign: KL92
File No.: SES-STA-20150318-00171
Special Temporary Authority (STA)



File # SES-STA-20150318-00171
Call Sign KL92 Grant Date 4/14/2015
(or other identifier)
Term Dates
From 4/15/2015 To: 5/14/2015
Approved: Paul E. Blair

Intelsat License LLC ("Intelsat") is granted STA, under the following conditions, for 30 days commencing April 15, 2015 for earth station KL92 at Castle Rock, CO, at 39° 16' 38.0" NL/104° 48' 25.0"W.L. to provide launch and early orbit phase (LEOP) services for THOR 7 satellite at permanent orbital location 1° W.L., licensed by Norway. The in-orbit testing location will be 12° W.L.

1. Uplink (Earth-to-space) frequencies will be on 13241.0 MHz and 13243.0 MHz (RHCP) within the coordinated emission and power limits.
2. Downlink (space-to-Earth) frequencies will be on 12494.5 MHz and 12495.5 MHz (LHCP).
3. The LEOP operations must be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path. 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. Currently the 24x7 contact information for the THOR 7 satellite 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.
4. Grant of this STA is without prejudice to any determination that the Commission may make regarding pending or future Intelsat License LLC applications.
5. All operations under this grant of STA shall be on an unprotected and non-harmful interference basis. Intelsat's KL92 shall not cause harmful interference to, and shall not claim protection from interference caused to it by, any other lawfully operating radio communication system.
6. In the event of any harmful interference as a result of operations under this grant of STA, Intelsat shall cease operations immediately upon notification of such interference and shall immediately inform the Commission, in writing, of such an event.
7. Any action taken or expense incurred as a result of operations pursuant to this STA is solely at Intelsat License LLC's risk.

This grant 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:	Susan H. Crandall	Phone Number:	703-559-7848
Company:	Intelsat Corporation	Fax Number:	703-559-3957
Street:	7900 Tysons One Place	E-Mail:	susan.crandall@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/Castle Rock		8. Latitude (dd mm ss.s h) 39 16 38.0 N	

9. State	CO	10. Longitude (dd mm ss.s h)	104 48 25.0	W
11. Please supply any need attachments.				
Attachment 1: STA Request		Attachment 2: Exhibit A		Attachment 3: Exhibit B
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 a grant of Special Temporary Authority for 30 days, commencing April 15, 2015, to use its Castle Rock, Colorado Ku-band earth station, call sign KL92, to provide launch and early orbit phase services for the THOR 7 satellite. THOR 7 is expected to be launched on April 15, 2015.				
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.				
14. Name of Person Signing Cynthia J. Grady		15. Title of Person Signing Regulatory Counsel, Intelsat Corporation		
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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Prepared By

COMSEARCH

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

Prepared For

**Intelsat License LLC
Castle Rock, Colorado**

Temporary Transmit/Receive Earth Station
Operation Dates: 04/14/2015 - 07/10/2015

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 March 10, 2015.

Company

3G Wireless, LLC
AERIAL VIDEO SYSTEMS
AT&T California
Alascom Inc
Ascent Media Network Services, LLC
Bellsouth Telecommunications, Inc.
BFI Licenses, LLC
Borgeson, Tom R.
Broadcast Sports Inc.
CBS Television Stations
CBTV, INC.
Circuit of the Americas, LLC
CNG Communications, Inc.
COLORADO PUBLIC TELEVISION, INC. KDBI-TV
CP Communications, LLC
Carolina Telephone and Telegraph Co
Casper, John
Catholic Television Apostolate
CenturyTel of the Southwest, Inc.
Chicago Comnet Corp
Cincinnati Bell Wireless LLC
Citywide News Network, Inc.
Cohen, Elena
Cowboys Stadium LP
DCI II, INC.
Denver Digital Television, LLC
Direct Broadcast Services, Inc.
Entravision Holdings, LLC
FULL GOSPEL OUTREACH, INC.
Federal Communications Commission
Fishman Brothers Enterprises

Company (Continued)

GOODYEAR TIRE AND RUBBER COMPANY
GSN News, Inc
Gray Television Licensee LLC (Gray TV)
Gray Television Licensee, LLC
HF Enterprises, Inc
Hallco Unlimited, Inc.
Hawaiian Telcom, Inc.
Heiden, William
Interlink Network Corp.
ION MEDIA DENVER LICENSE, INC.
Illinois Bell Telephone Company
Indiana Bell Telephone Company
Information & Display Systems, Inc.
Information Super Station, LLC
International Communications Group, Inc.
KWGN, LLC
Kentucky RSA #3 Cellular General Partner
Kentucky RSA #4 Cellular General Partner
LIN Television Corporation
Loop Inc.
MERCURY COMMUNICATIONS
Metro Networks Communications, Inc.
Metrosat Communications Inc.
Michigan Bell Telephone Company
Microwave Video Systems, LLC
Moreen, Steven K
Multimedia Holdings Corporation
NEW ENGLAND DIGITAL DISTRIBUTION, INC.
NEW ENGLAND SATELLITE SYSTEMS INC
NSM Surveillance
Navajo Communications Company
NorthWest Suburbs Community Access Corp
OHIO BELL TELEPHONE COMPANY
Onboard Images
Pacific Television Center
Penn Service Microwave Co., Inc.
Pikes Peak Television, Inc.
Plateau Telecommunications, Inc.
Plum TV, LLC
Production & Satellite Services, Inc.
Public Television Communications Center
QUICK LINK CONNECTIONS INC
Qwest Corporation
RCC Minnesota Inc. - MN NE ND SD
REMOTE FACILITIES CONSULTING SERVICES
RF Central, LLC
RF Film, Inc
RF Technology, LLC
Radiofone, Inc.
Randy Hermes Production
Regulus Media Services, Inc.
Remote Broadcasts, Inc.
Rocky Mountain Public Broadcasting Netwo

Company (Continued)

Sangre De Cristo Communications, LLC
Scripps Media, Inc. - KMGH TV
Smoky Hills Public Television Corp.
Southwestern Bell Telephone L.P.
Speedshotz, Inc
Syncom Media Group, Inc
Time Warner Cable Pacific West LLC
Total RF Marketing Inc
Tribune Broadcasting Denver License, LLC
TV Microwaves Co.
Unisat, Inc.
United Telephone - Southeast
VERIZON SOUTH INC.
Verizon California Inc.
Verizon Maryland, Inc.
Verizon New England Inc.
Verizon New Jersey, Inc.
Verizon New York, Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania, Inc.
Verizon Virginia, Inc.
Verizon Washington DC, Inc.
Village Video Productions Inc
Vyvx, LLC
Westar Satellite Services LP
Western Technical Services
Wexler Video, Inc.
Winged Vision Inc
Wisconsin Bell, Inc.
Wolfe Air Aviation
Word of God Fellowship, Inc

Society of Broadcast Engineers Frequency Coordinators

Colorado: Front Range Region
Western Slope Region

Kansas: Entire State Except Kansas City Area

Nebraska: Eastern Region

New Mexico: Entire State (1 GHz Up)

Wyoming: Entire State

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: 03/16/2015
Job Number: 150310COMSJC03

Administrative Information

Status	TEMPORARY (Operation from 04/14/2015 to 07/10/2015)
Call Sign	TEMP07
Licensee Code	INTELS
Licensee Name	Intelsat License LLC

Site Information **CASTLE ROCK, COLORADO**

Venue Name	
Latitude (NAD 83)	39° 16' 38.0" N
Longitude (NAD 83)	104° 48' 26.9" W
Climate Zone	A
Rain Zone	2
Ground Elevation (AMSL)	2087.36 m / 6848.3 ft

Link Information

Satellite Type	Geostationary
Mode	TO - Transmit-Only
Modulation	Analog and Digital
Satellite Arc	33° W to 177° West Longitude
Azimuth Range	101.8° to 258.5°
Corresponding Elevation Angles	5.3° / 5.0°
Antenna Centerline (AGL)	7.74 m / 25.4 ft

Antenna Information

Transmit

Manufacturer	NEC
Model	12.5 Meter
Gain / Diameter	64.0 dBi / 12.5 m
3-dB / 15-dB Beamwidth	0.12° / 0.22°

Max Available RF Power	(dBW/4 kHz)	4.7
	(dBW/MHz)	28.7

Maximum EIRP	(dBW/4 kHz)	68.7
	(dBW/MHz)	92.7
	(dBW)	92.0

Interference Objectives:	Long Term	-151.0 dBW/4 kHz	20%
	Short Term	-128.0 dBW/4 kHz	0.0025%

Frequency Information

Transmit 13.0 GHz

Emission / Frequency Range (MHz)	850KFXD / 13241.0
	850KFXD / 13243.0

Max Great Circle Coordination Distance	535.6 km / 332.8 mi
Precipitation Scatter Contour Radius	317.8 km / 197.4 mi

COMSEARCH

Earth Station Data Sheet

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

Coordination Values	CASTLE ROCK, CO	
Licensee Name	Intelsat License LLC	
Latitude (NAD 83)	39° 16' 38.0" N	
Longitude (NAD 83)	104° 48' 26.9" W	
Ground Elevation (AMSL)	2087.36 m / 6848.3 ft	
Antenna Centerline (AGL)	7.74 m / 25.4 ft	
Antenna Model	NEC 12.5 Meter	
Antenna Mode	Transmit 13.0 GHz	
Interference Objectives: Long Term	-151.0 dBW/4 kHz	20%
Short Term	-128.0 dBW/4 kHz	0.0025%
Max Available RF Power	4.7 (dBW/4 kHz)	

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 13.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
0	5.43	101.50	-10.00	100.00
5	5.55	96.76	-10.00	100.00
10	5.61	91.76	-10.00	100.00
15	6.07	86.76	-10.00	100.00
20	5.89	81.76	-10.00	100.00
25	5.78	76.76	-10.00	100.00
30	5.84	71.76	-10.00	100.00
35	5.61	66.76	-10.00	100.00
40	4.76	61.76	-10.00	100.00
45	4.09	56.76	-10.00	100.00
50	3.20	51.79	-10.00	100.00
55	2.70	46.81	-9.76	100.00
60	2.48	41.83	-8.54	100.00
65	1.40	36.93	-7.19	121.27
70	1.20	31.99	-5.63	130.62
75	0.35	27.18	-3.86	186.64
80	0.00	22.37	-1.74	206.99
85	0.00	17.56	0.89	217.33
90	0.00	12.89	4.24	231.63
95	0.21	8.46	8.81	251.80
100	0.24	5.38	13.74	519.51
105	0.00	6.23	12.13	346.64
110	0.22	9.56	7.49	244.93
115	0.25	13.23	3.96	225.20
120	0.29	16.84	1.34	210.34
125	0.25	20.41	-0.75	206.17
130	0.47	23.69	-2.36	181.48
135	0.41	27.03	-3.79	181.19
140	0.46	30.11	-4.97	171.70
145	0.42	33.07	-5.99	171.47
150	0.58	35.62	-6.79	153.04
155	0.83	37.80	-7.44	137.29
160	0.93	39.75	-7.98	130.99
165	0.98	41.35	-8.41	128.18
170	1.00	42.55	-8.72	126.66
175	0.88	43.40	-8.94	130.86
180	0.85	43.69	-9.01	131.34

COMSEARCH

Earth Station Data Sheet

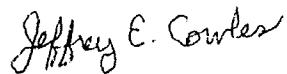
19700 Janelia Farm Boulevard, Ashburn, VA 20147
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Coordination Values	CASTLE ROCK, CO	
Licensee Name	Intelsat License LLC	
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Antenna Model	NEC 12.5 Meter	
Antenna Mode	Transmit 13.0 GHz	
Interference Objectives: Long Term	-151.0 dBW/4 kHz	20%
Short Term	-128.0 dBW/4 kHz	0.0025%
Max Available RF Power	4.7 (dBW/4 kHz)	

Azimuth (°)	Horizon Elevation (°)	Antenna Discrimination (°)	Transmit 13.0 GHz	
			Horizon Gain (dBi)	Coordination Distance (km)
185	0.93	43.36	-8.93	129.05
190	1.35	42.21	-8.63	117.89
195	1.09	41.25	-8.39	125.24
200	1.41	39.33	-7.87	118.90
205	1.52	37.21	-7.27	118.05
210	1.99	34.48	-6.44	109.96
215	1.80	31.99	-5.63	117.00
220	2.46	28.60	-4.41	107.97
225	2.38	25.58	-3.20	113.52
230	2.63	22.15	-1.63	114.48
235	2.58	18.79	0.15	121.87
240	2.67	15.21	2.45	128.70
245	2.80	11.52	5.46	136.71
250	2.91	7.76	9.75	153.47
255	2.95	4.02	16.91	312.74
260	3.09	2.45	22.28	535.59
265	3.14	6.77	11.24	155.94
270	4.17	11.53	5.46	114.15
275	4.14	16.52	1.55	101.16
280	4.12	21.52	-1.32	100.00
285	4.42	26.50	-3.58	100.00
290	4.73	31.50	-5.46	100.00
295	4.37	36.50	-7.06	100.00
300	4.24	41.50	-8.45	100.00
305	4.59	46.50	-9.69	100.00
310	5.61	51.50	-10.00	100.00
315	6.51	56.51	-10.00	100.00
320	7.34	61.52	-10.00	100.00
325	7.22	66.51	-10.00	100.00
330	6.96	71.51	-10.00	100.00
335	6.27	76.50	-10.00	100.00
340	5.49	81.50	-10.00	100.00
345	4.96	86.50	-10.00	100.00
350	4.97	91.50	-10.00	100.00
355	5.13	96.50	-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.



Jeffrey E. Cowles
Engineer III, Telecommunications
COMSEARCH
19700 Janelia Farm Blvd.
Ashburn, Va. 20147

DATED: March 16, 2015

March 18, 2014

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

Re: Request for Special Temporary Authority
Castle Rock, Colorado Earth Station KL92

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing April 15, 2015, to use its Castle Rock, Colorado Ku-band earth station—call sign KL92—to provide launch and early orbit phase (“LEOP”) services for the THOR 7 satellite. THOR 7 is expected to be launched on April 15, 2015.² The LEOP period is expected to last approximately ten days.³

The THOR 7 LEOP operations will be performed in the following frequency bands: 13241.0 MHz and 13243.0 MHz in the uplink (RHCP), and 12494.5 MHz and 12495.5 MHz in the downlink (LHCP). The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁴ 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 THOR 7 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.

In further support of this request, Intelsat hereby attaches Exhibits A and B, 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

¹ Intelsat has filed its STA request, an FCC Form 159, a \$195.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

² The permanent orbital location for THOR 7, which Intelsat understands is licensed by Norway, will be at 1.0° W.L. The in-orbit testing location will be 12° W.L.

³ Intelsat is seeking authority for 30 days to accommodate a possible launch delay.

⁴ Space Systems/Loral (“SS/L”), the manager of the THOR 7 LEOP mission, will handle the coordination.

Ms. Marlene H. Dortch
March 18, 2015
Page 2

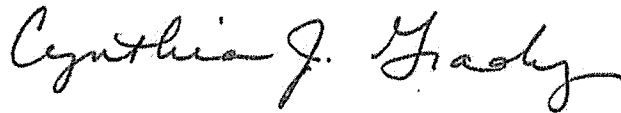
terrestrial facility, as well as a waiver request. Intelsat also notes that for purposes of the THOR 7 LEOP mission, it is seeking to operate in the frequencies listed in the request at power levels not to exceed 22 dBW. The technical information submitted with this STA request reflects a power level as high as 29 dBW because Intelsat might operate at this level in the event an emergency necessitates the use of a higher power level in order to command the satellite. 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 THOR 7 LEOP mission, SS/L will serve as the mission manager. SS/L 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 SS/L. 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 THOR 7 satellite. This, in turn, will help will provide additional capacity for broadcast and broadband services at the 1.0° W.L. orbital location and thereby promotes the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

A handwritten signature in black ink, reading "Cynthia J. Grady". The signature is fluid and cursive, with the first name "Cynthia" and last name "Grady" clearly legible.

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais

Exhibit A

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 operate with a non-U.S. licensed space station *to serve the United States*" must demonstrate that effective competitive opportunities exist and must provide the same technical information 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. With respect to Section 25.114, Intelsat seeks authority only to provide LEOP services for the THOR 7 satellite. The information sought by Section 25.114 is not relevant to LEOP services. Moreover, Intelsat does not have—and would not easily be able to obtain—such information because Intelsat is not the operator of the THOR 7 satellite, nor is Intelsat in contractual privity with that operator. Rather, an affiliate of Intelsat has a contract with Space Systems/Loral ("SS/L"), the manufacturer of the THOR 7 satellite, to conduct LEOP services for the satellite.

¹ 47 C.F.R. § 25.137 (emphasis added).

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*, DA 13-593, File No. SAT-STA-20130220-00023 (released Apr. 1, 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*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

The information that Intelsat is not including is not required to determine potential harmful interference. The Schedule S information for this satellite would pertain to the operation of the THOR 7 satellite at its final orbital location. However, the present application for LEOP services involves communications *prior* to the satellite attaining its final location in the geostationary orbit. In other words, during the LEOP mission, the earth station will not be communicating with a satellite located in the geostationary orbit. Rather, it will be transmitting to a satellite traveling on its “transfer orbit” or “LEOP path,” which starts immediately following its separation from a launch vehicle, and ends when the satellite reaches its geostationary orbital location. Moreover, as with any STA, Intelsat will perform the LEOP services on a non-interference basis.

Because it is not relevant to the service for which Intelsat seeks authorization, and because obtaining the information would be a hardship, Intelsat seeks a waiver of all the information required by Section 25.114. Intelsat has provided in this STA request the required technical information that is relevant to the LEOP services for which Intelsat seeks authorization.

Good cause also exists to waive Section 25.137. Section 25.137 is designed to ensure that “U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services” in other countries. Here, there is no service being provided by the satellite; it is simply being placed in its orbital location after separating from the launch vehicle. Thus, the purpose of the information required by Section 25.137 is not implicated here. For example, Section 25.137(d) requires earth station applicants requesting authority to operate with a non-U.S.-licensed space station that is not in orbit and operating to post a bond.⁷ The underlying purpose in having to post a bond—*i.e.*, to prevent warehousing of orbital locations by operators seeking to serve the United States—would not be served by requiring Intelsat to post a bond in order to provide approximately ten days of LEOP services to the THOR 7 satellite.

It is Intelsat’s understanding that THOR 7 is licensed by Norway, which is a WTO-member country. Thus, the purposes of Section 25.137—to ensure that U.S. satellite operators enjoy “effective competitive opportunities” to serve foreign markets and to prevent warehousing of orbital locations serving the United States—will not be undermined by grant of this waiver request.

⁷ See 47 C.F.R. §25.137(d)(4).