#### NARRATIVE STATEMENT

Pursuant to Sections 5.51 and 5.54(a)(1) of the Federal Communications Commission's ("FCC" or "Commission") rules, <sup>1</sup> Intelsat License LLC, as debtor in possession ("Intelsat"), respectfully requests an experimental license for two months—beginning May 16, 2021—to operate in the 4605-4625 MHz and 4670-4700 MHz bands to test two ground terminals that will later be used to support Intelsat's high-altitude platform system ("HAPS") testing.<sup>2</sup> Specifically, Intelsat requests authorization to operate a stationary, terrestrial, <sup>3</sup> point-to-point microwave feeder link between a 1.8 meter General Dynamics Satcom antenna and a 3.8 meter Vertex antenna located approximately 100 meters apart from each another at Intelsat's teleport in Ellenwood, GA.

The FCC previously granted Intelsat special temporary authorization ("STA") to conduct the above-described ground terminal testing for four months, beginning January 15, 2021, and ending on May 16, 2021. Due to unforeseen delays by the manufacturer, Intelsat has not yet received all equipment required to complete testing. Intelsat therefore requests a conventional experimental authorization or, in the alternative, a two-month extension of Intelsat's current STA, authorizing Intelsat to conduct ground terminal testing at its Ellenwood, GA teleport until July 16, 2021. The operating parameters and technical details requested herein are identical to those requested previously by Intelsat and approved by the Commission under STA.<sup>5</sup>

Grant of the requested experimental license would serve the public interest, convenience, and necessity by enabling Intelsat to enhance its ability to continue its ongoing efforts to develop innovative services to support the information needs of the public. In support of its request, Intelsat provides the following additional information:

### 1. Operation Description

Intelsat proposes to test terrestrial, fixed, point-to-point microwave feeder link transmissions between a 1.8 meter General Dynamics Satcom antenna and a 3.8 meter Vertex antenna approximately 100 meters away. The proposed transmissions will occur in the 4605-4625 MHz and 4670-4700 MHz frequency bands.

<sup>&</sup>lt;sup>1</sup> 47 C.F.R. §§ 5.51, 5.54(a)(1).

The Commission has granted Intelsat an experimental license for one year to conduct proof of concept testing to determine the feasibility of utilizing a HAPS to support a broadband application for fixed and mobile end users. *See* Intelsat US LLC, as Debtor-in-Possession, Experimental Radio Station Construction Permit and License, Call Sign WL2XHT, File No. 0730-EX-CN-2020 (effective Nov. 12, 2020).

Intelsat is not requesting authorization to communicate to or from an elevated platform.

Intelsat License LLC, Experimental Temporary Authorization, Call Sign WR9XKP, File No. 1858-EX-ST-2020 (effective Jan. 15, 2021).

<sup>&</sup>lt;sup>5</sup> See id.

## 2. Location of Proposed Experiment

Testing will occur at Intelsat's teleport in Ellenwood, GA.

33° 39' 52.5"N, 84° 16' 12.0"W

#### 3. Testing Duration

Intelsat is currently authorized by STA to conducting testing from January 15, 2021, until May 16, 2021. Due to unforeseen delays in receiving equipment required for testing, Intelsat requests authorization to continue testing for an additional two months, from May 16, 2021, until July 16, 2021.

#### 4. Technical Details

Frequencies: 4605-4625 MHz and 4670-4700 MHz

#### 1.8 meter General Dynamics Satcom Antenna

Antenna Manufacturer	General Dynamics Satcom
Antenna Model Number	Series 1184
Number of Units	1
Type	Fixed
Maximum ERP or EIRP	0.5 kW
Emission Designator	30M0W7W
Overall Height of Antenna AGL	10 ft

#### 3.8 Meter Vertex Antenna

Antenna Manufacturer	Vertex
Antenna Model Number	DPK (DS318)
Number of Units	1
Type	Fixed
Maximum ERP or EIRP	1.5 kW
Emission Designator	30M0W7W
Overall Height of Antenna AGL	14 ft

## 5. Operational Safeguards and Coordination Efforts

Intelsat recognizes that experimental operations must not cause harmful interference to authorized facilities. Accordingly, prior to commencing operations, Intelsat will coordinate with incumbent licensees to ensure that Intelsat's testing does not interfere with authorized operations. Should interference occur, however, Intelsat will take immediate steps to resolve the interference, including, if necessary, for the discontinuance of operations and provides a stop buzzer point of contact in Section 6 below.

# 6. Contact Information

Intelsat Stop Buzzer Contact Intelsat FCC Contact Intelsat FCC Legal Counsel Contact

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