NARRATIVE STATEMENT

Pursuant to Sections 5.54(a)(2) and 5.61 of the Federal Communications Commission's ("FCC" or "Commission") rules,[1] Intelsat License LLC, as debtor in possession ("Intelsat"), respectfully requests special temporary authorization ("STA") for 4 months—beginning January 15, 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.[2] Specifically, Intelsat requests STA to operate a stationary, terrestrial,[3] 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.

Grant of the requested STA 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.

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 expects testing to last approximately 4 months, beginning January 15, 2021, and ending April 30, 2021.

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1 47 C.F.R. §§ 5.54(a)(2), 5.61.

2 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).

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

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

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Intelsat FCC Contact

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