

**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 modification of Conventional Experimental Authorization file number 0730-EX-CN-2020, Call Sign WL2XHT (the "Experimental License").<sup>2</sup> The Experimental License authorizes Intelsat to operate for one year in the 894-915 MHz, 925-960 MHz, and the 4500-4800 MHz frequency bands to conduct proof of concept testing around Yuma Proving Ground, AZ for a high-altitude platform system ("HAPS").

By this application, Intelsat requests modification of the Experimental License to increase the area authorized for service link communications between the HAPS and user ground terminals from a 30 km radius around center point 33-12-00N, 114-00-00W, to a 52 km radius.

All other operations authorized by the Experimental License would remain unchanged. Specifically, Intelsat does not request changes to the 70 km radius area around center point 33-12-00N, 114-00-00W, authorized for feeder link communications between the HAPS and gateway station, to service link operations in the 894-915 MHz and 925-960 MHz band, or to feeder link operations in the 4500-4800 MHz band.

Intelsat does not anticipate that increasing the authorized area for service link communications from a 30 km to 52 km radius area will require additional coordination with the National Telecommunications and Information Administration ("NTIA"), given the level of review completed already by NTIA as part of Intelsat's application for the Experimental License. Additionally, 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, arranging for the discontinuance of operations.

Grant of this modification request would serve the public interest, convenience, and necessity by enabling Intelsat to determine the feasibility of utilizing a HAPS to support a broadband application for fixed and mobile end users. The increase in area for service link communications will provide Intelsat with additional flexibility in where it locates ground terminals for testing—a process complicated in part by the terrain conditions at Yuma Proving Ground and the need for road access. This flexibility would allow Intelsat to enhance its ability to continue ongoing efforts to develop innovative services to support the information needs of the public.

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

<sup>2</sup> Intelsat US LLC, as debtor in possession, Experimental Radio Station Construction Permit and License, File No. 0730-EX-CN-2020, Call Sign WL2XHT (granted Nov. 12, 2020).