INTELSAT
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November 28, 2018

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

Re: Request for Special Temporary Authority to Operate Intelsat 16 at 76.2° W.L. with New Beam Coverage; Call Sign: S2750

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests grant of Special Temporary Authority ("STA")[1] for 180 days, commencing upon grant, to temporarily operate Intelsat 16's (S2750) Ku-band beam over a new coverage area in the communications frequencies 14000-14500 MHz and 11700-12200 MHz in order to conduct a customer test. The proposed test is expected to take approximately 3-6 months and a coverage map of the new beam coverage is enclosed as Exhibit A. Intelsat has also filed a 30-days STA for this testing.[2]

Intelsat 16 is permanently licensed to operate at 76.2º W.L. with a different beam coverage than the beam coverage proposed herein.[3] The satellite's Ku-band beam will be biased in order to achieve the new coverage. Intelsat's proposed operation of Intelsat 16 will conform to existing coordination agreements and the FCC's rules governing operations vis-à-vis adjacent locations.

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1 Intelsat has filed this STA request, an FCC Form 159, and a $980.00 filing fee electronically via the International Bureau's Filing System.

2 *See Intelsat License LLC, 30-Day STA Request to Temporarily Operate Intelsat 16 With a New Coverage Area (Call Sign S2750)*, File No. SAT-STA-20181127-00085 (filed Nov. 27, 2018).

3 *See Policy Branch Information; Actions Taken*, Report No. SAT-01334, File No. SAT-MOD-20180424-00029 (July 27, 2018) (Public Notice).

Intelsat US LLC
7900 Tysons One Place, McLean, VA 22102-5972 USA **www.intelsat.com** T +1 703-559-6800

The temporary operation of Intelsat 16's Ku-band beam with a different coverage than authorized by its current license will help test a customer's service. Accordingly, grant of this STA request is in the public interest.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

Attachment

Cc: Stephen Duall
Jay Whaley
Cindy Spiers

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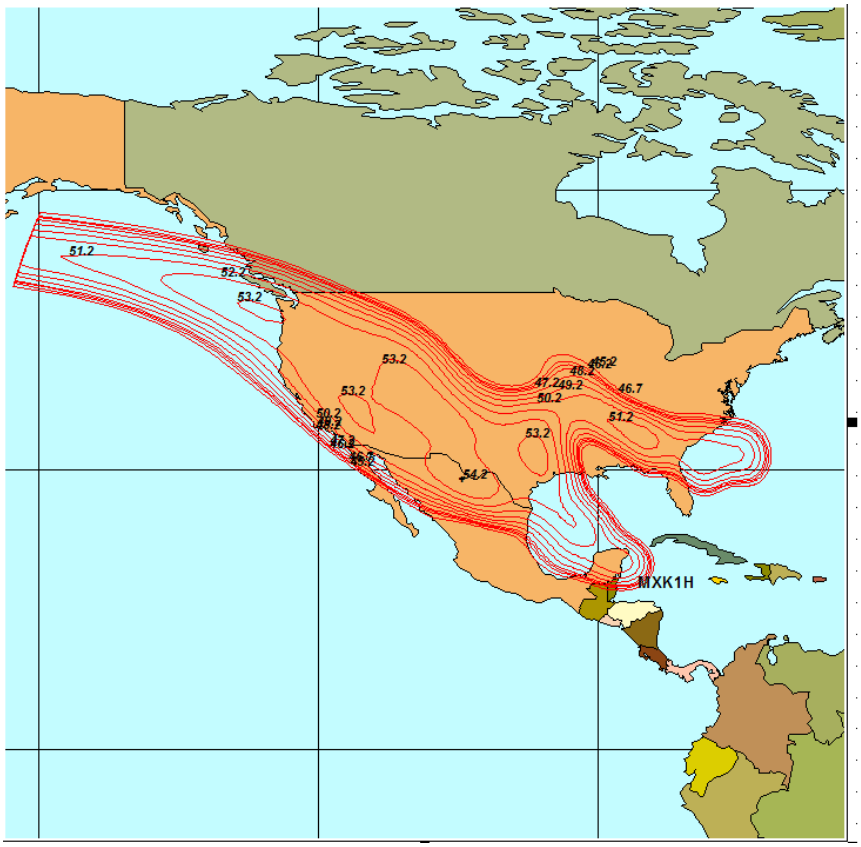
Exhibit A

Exhibit A: Intelsat 16 Proposed Beam Coverage



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Intelsat 16 @ 283.8°E

Ku-Band Mexico H1

Transmit Coverage

Beam Pointing:	1.67°E 2.00°N
Rotation Angle:	0.00°CW

Contours	EIRP [dBW]
Beam Peak (0.0)	54.2
-1.0	53.2
-2.0	52.2
-3.0	51.2
-4.0	50.2
-5.0	49.2
-6.0	48.2
-7.0	47.2
-7.5	46.7
-8.0	46.2
-9.0	45.2

Beam Edge EIRP values from IESS-410 Rev 8B.
Nominal Beam Peak EIRP and contour values
(dB from B.E.) derived from ACP 202 Rev 6.10.