



INTELSAT.

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July 31, 2019

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

Re: Request for Extension of 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 an additional 180 days 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.² The proposed test is ongoing and expected to take an additional 3-6 months. Intelsat incorporates by reference Exhibit A, a map of the new beam coverage, included with its original STA request.³

Intelsat 16 is permanently licensed to operate at 76.2° W.L. with a different beam coverage than the beam coverage proposed herein.⁴ The satellite’s Ku-band beam has been biased in order to achieve the new coverage. Intelsat’s continued operations of Intelsat 16 will conform to existing coordination

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 *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01370, File No. SAT-STA-20181128-00086 (Public Notice) (February 15, 2019).

³ See *supra*.

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-01334, File No. SAT-MOD-20180424-00029 (July 27, 2018) (Public Notice).

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agreements and the Federal Communication Commission's ("Commission") rules governing operations vis-à-vis adjacent locations.

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

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA extension request. Please direct any questions regarding this request to (703) 559-6949.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Cindy Spiers