



**INTELSAT.**

*Envision. Connect. Transform.*

September 12, 2019

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

Re: Request for Special Temporary Authority to Operate Intelsat 904 at 29.5° W.L. with New Beam Coverages; Call Sign: S2408

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)<sup>1</sup> for 60 days, commencing October 7, 2019, to operate Intelsat 904’s (S2408) C-band beams over a new coverage area in the communications frequencies 3625-4200 MHz and 5850-6425 MHz in order to provide new customer service. Intelsat will be filing a license modification application to support these new service areas. Maps of the new coverages are enclosed as Exhibit A.

Intelsat 904 is permanently licensed to operate at 29.5° W.L. with different standard C-band beam coverages than proposed herein.<sup>2</sup> Intelsat is seeking authority to bias all eight of the satellite’s C-band beams in order to achieve the new coverage areas.<sup>3</sup> All other Intelsat 904 beams will operate within the currently licensed beam coverages. Intelsat’s proposed operation of Intelsat 904 will conform to existing coordination agreements and the Federal Communications Commission’s (“Commission”) rules governing operations vis-à-vis adjacent locations.

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<sup>1</sup> Intelsat has filed this STA request, an FCC Form 159, and a \$980.00 filing fee electronically via the International Bureau’s Filing System.

<sup>2</sup> See *Policy Branch Information, Actions Taken*, Report No. SAT-01405, File No. SAT-MOD-20190422-00031 (Aug. 2, 2019) (Public Notice).

<sup>3</sup> Intelsat will bias the satellite platform in order to obtain the new C-band coverages.

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Exhibit A  
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The temporary operation of Intelsat 904's C-band beams with different coverages than authorized by its current license will allow Intelsat to meet new customer service demands. Accordingly, grant of this STA request is in the public interest.

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

Sincerely,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Senior Counsel  
Intelsat US LLC

Attachment

Cc: Stephen Duall  
Jay Whaley  
Cindy Spiers

**Exhibit A: Intelsat 904 Proposed Beam Coverages**

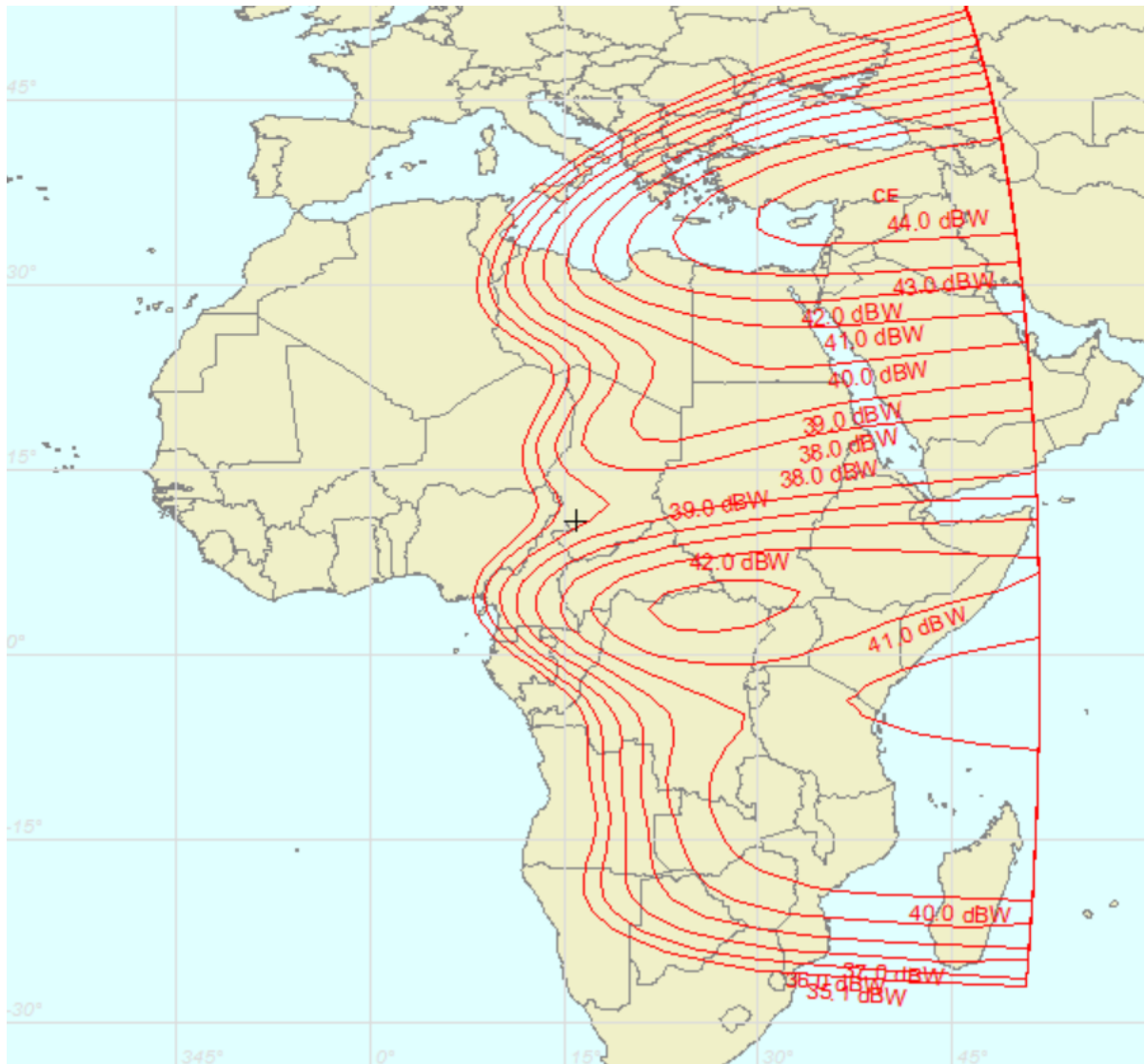


Figure 1: C-Band Combined East **Zone** Beam

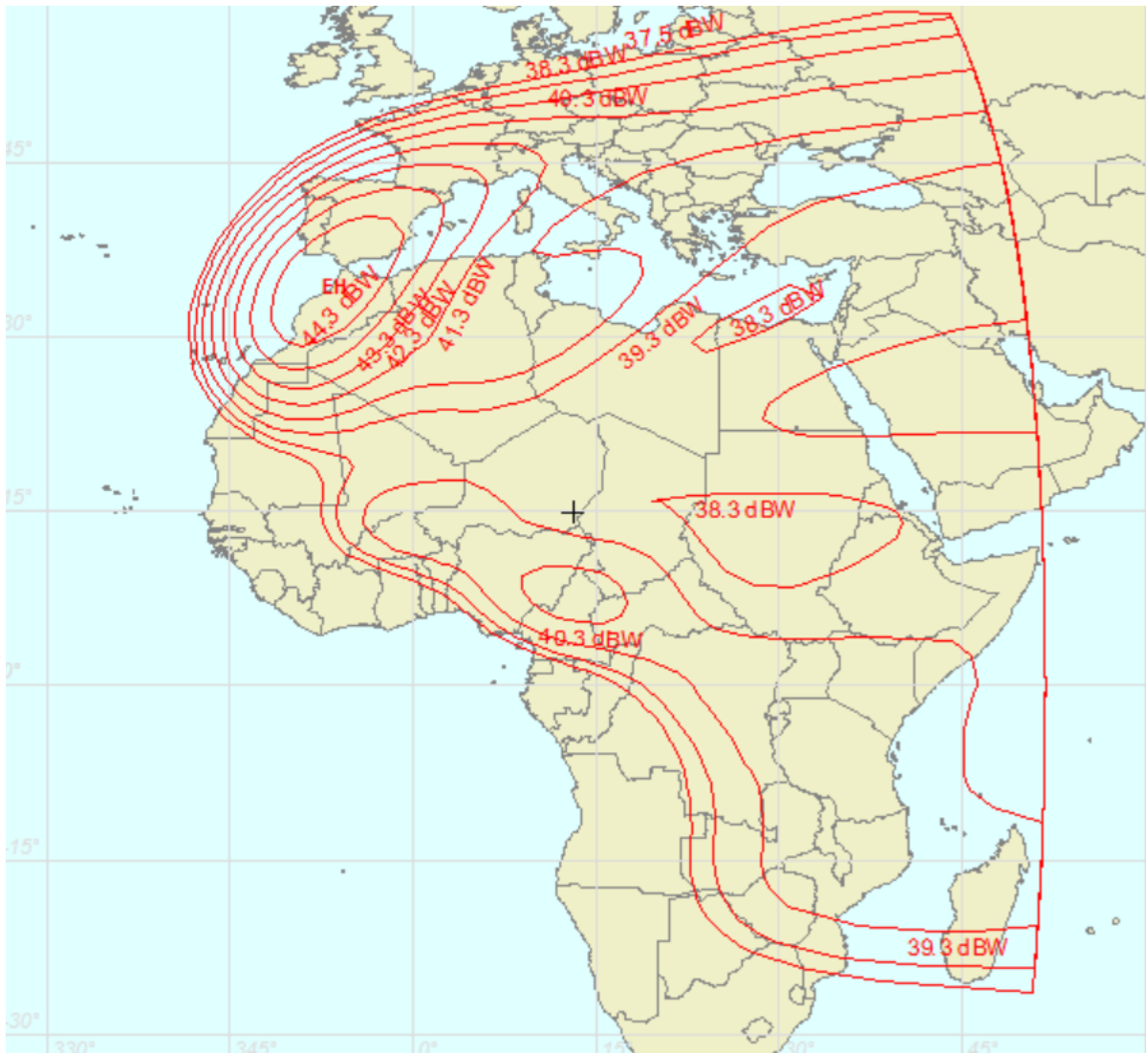


Figure 2: C-Band East Hemi Beam

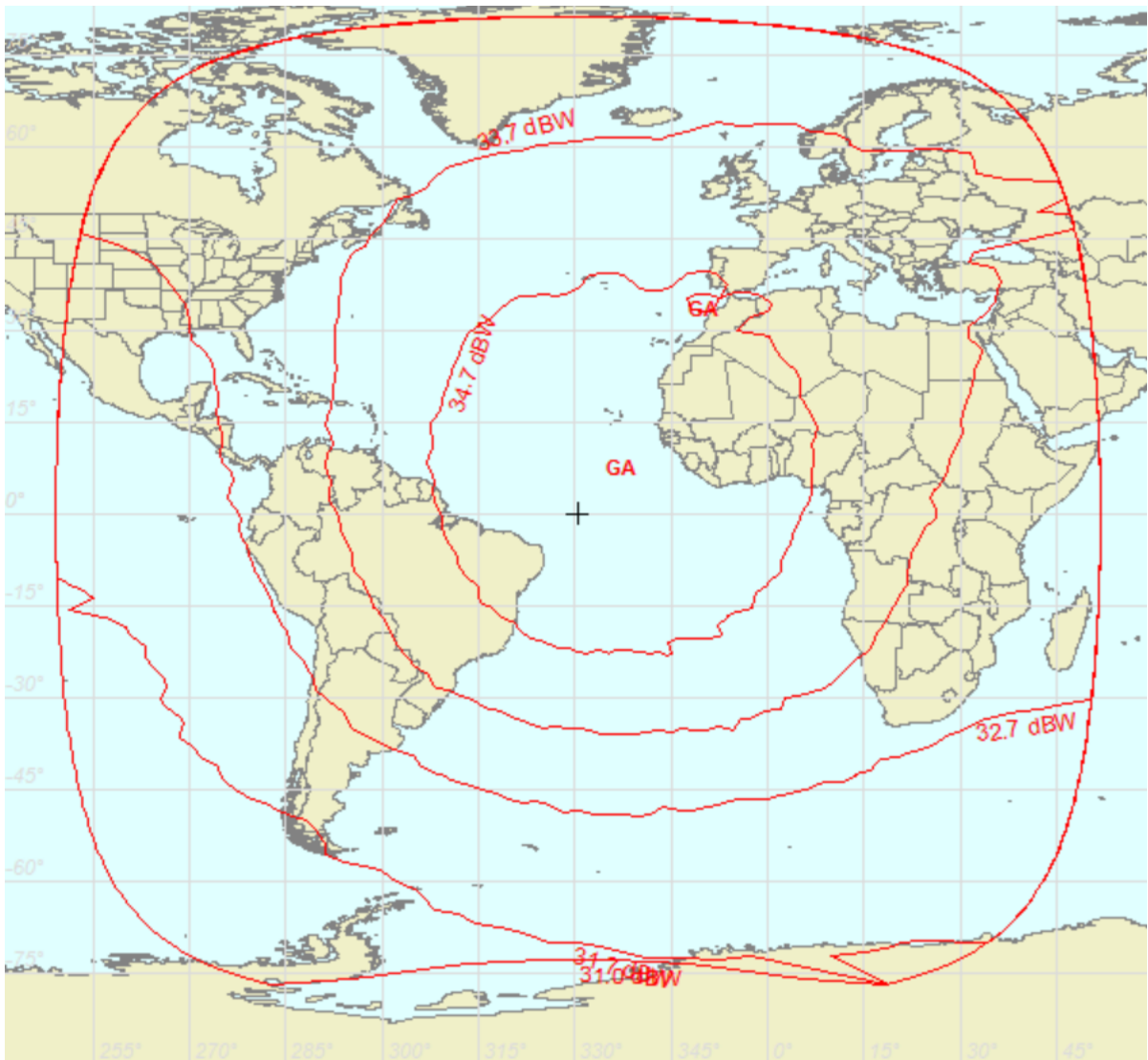


Figure 3: C-Band Global A Beam

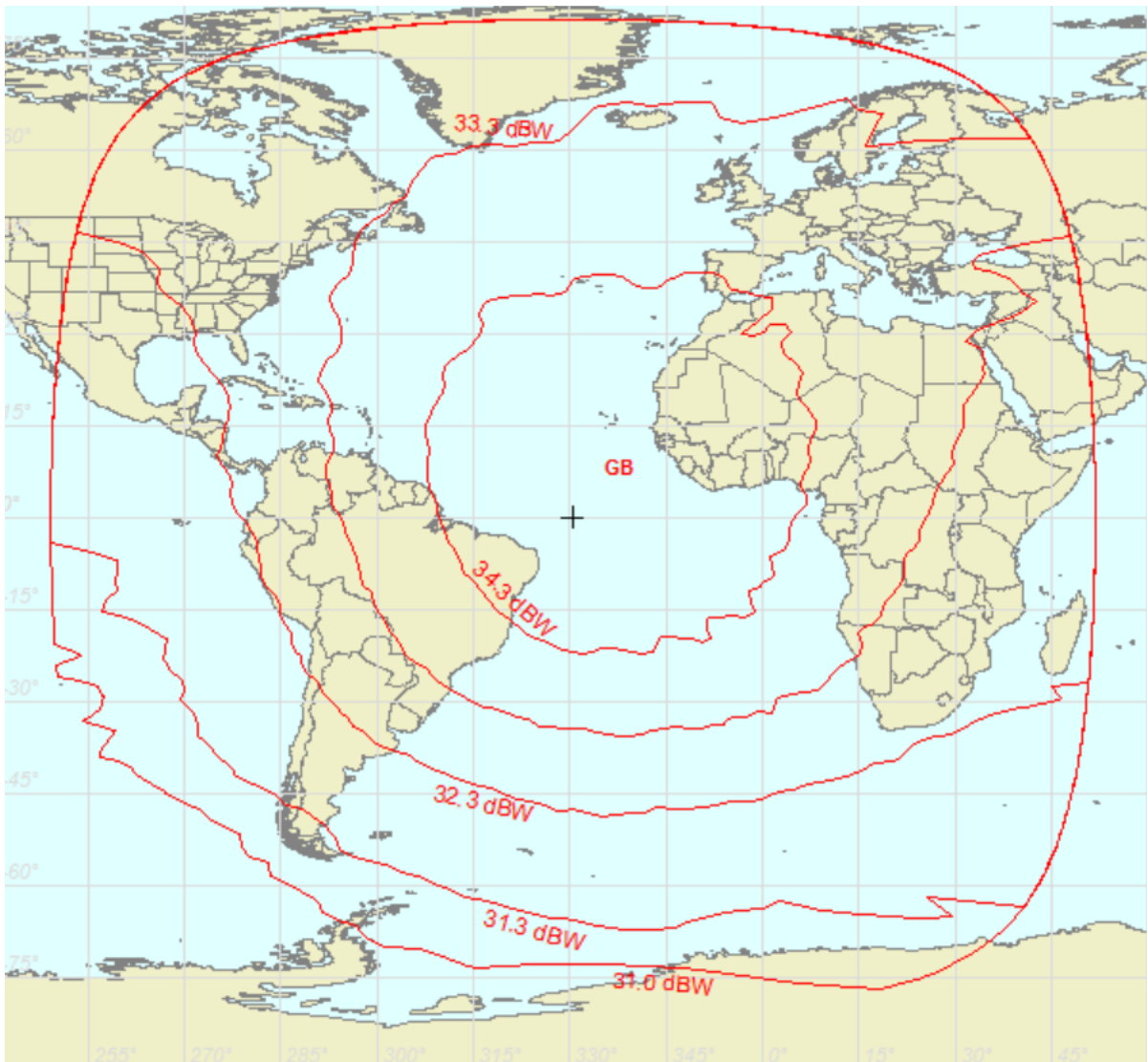


Figure 4: C-Band Global B Beam

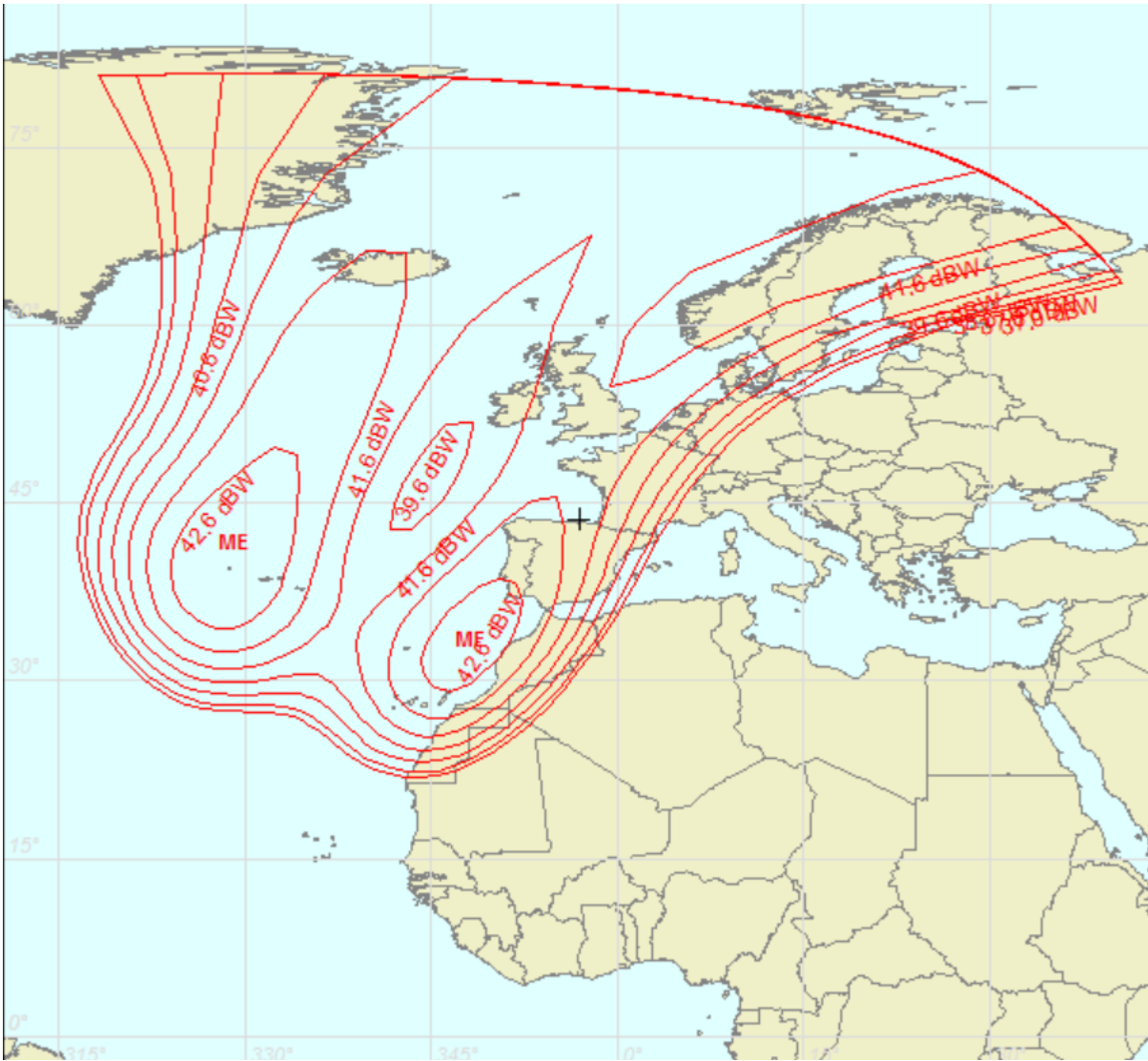


Figure 5: C-Band ~~Middle East~~ **North Atlantic Zone** Beam

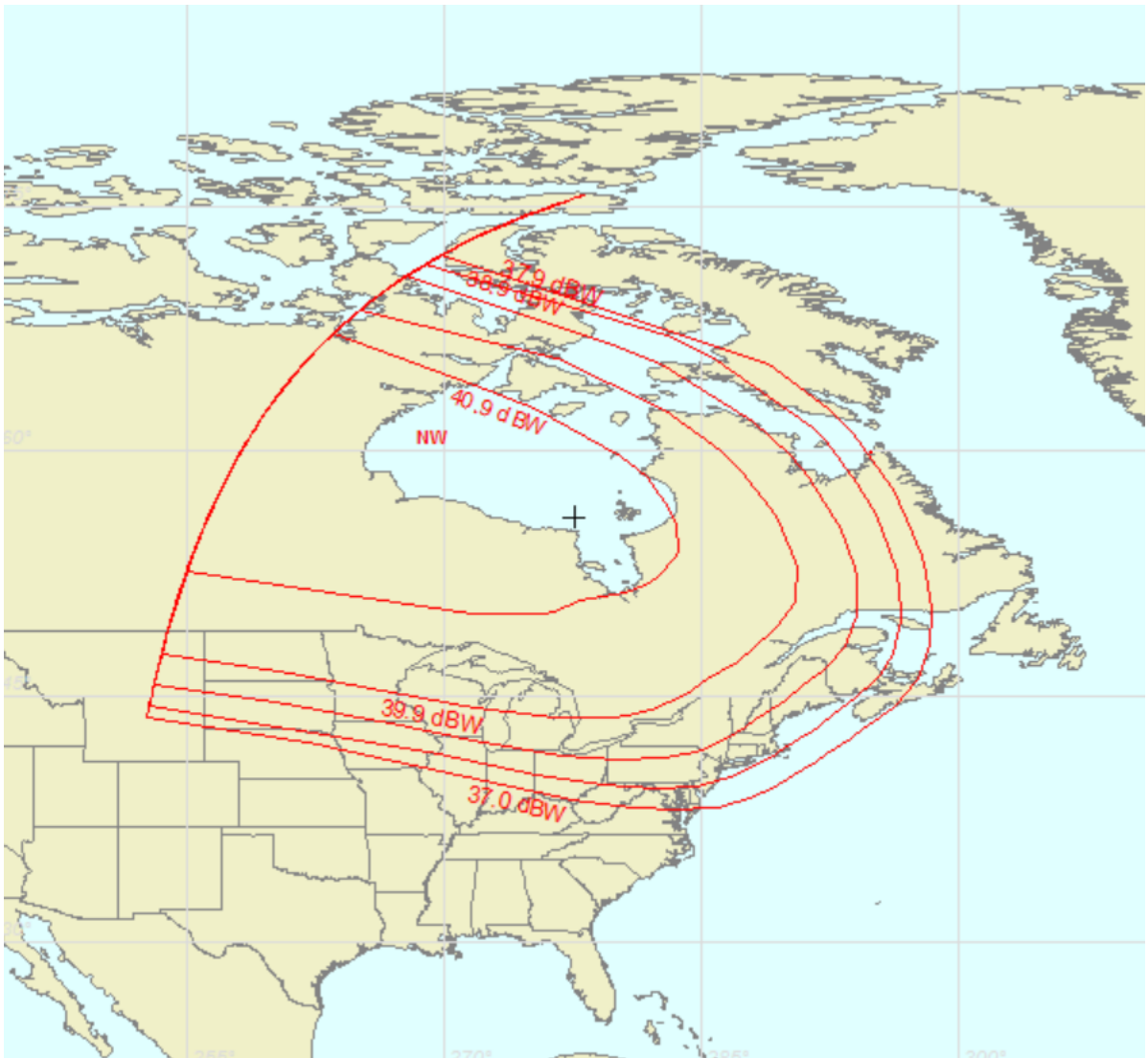


Figure 6: C-Band Northwest **Zone** Beam



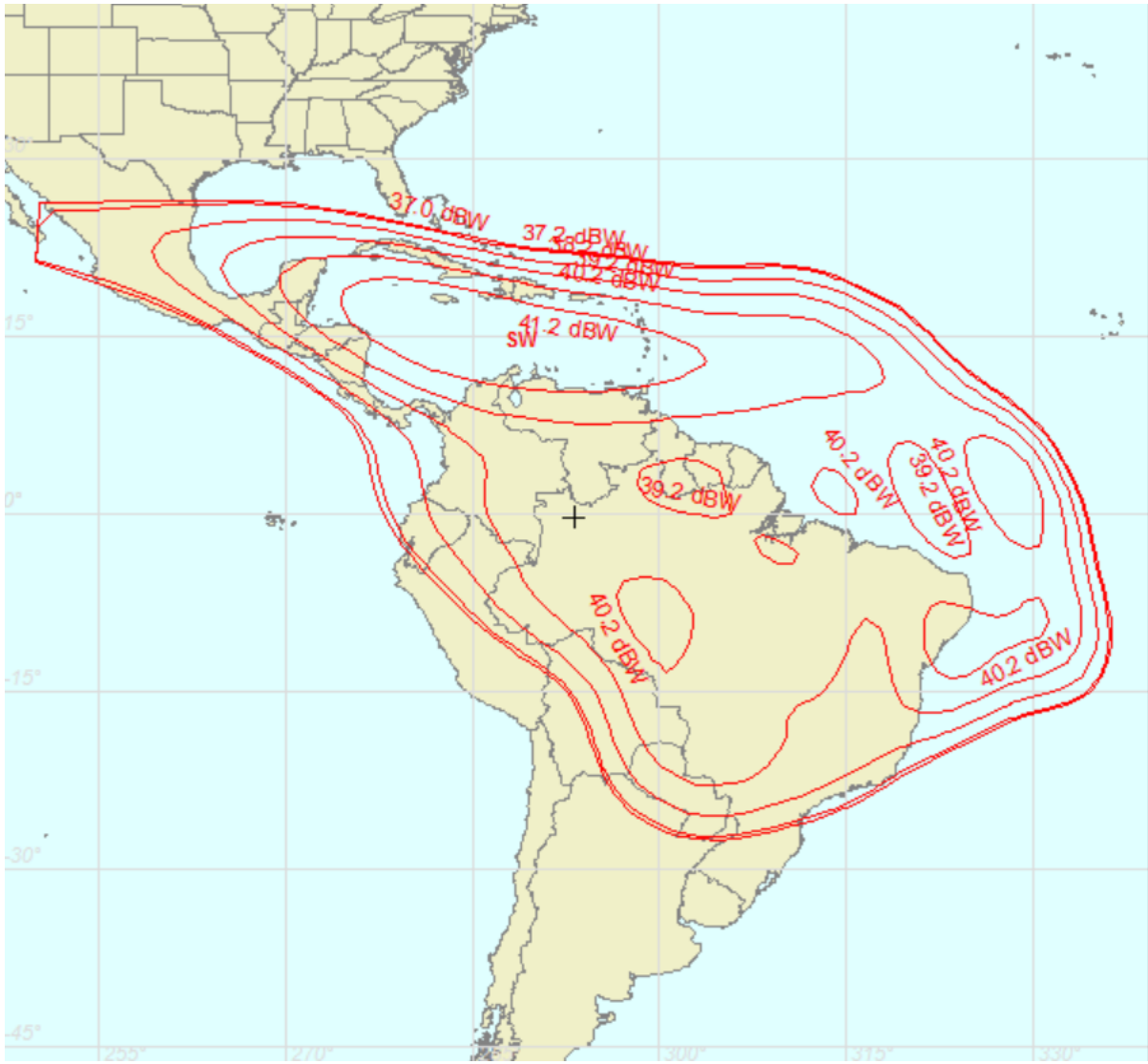


Figure 7: C-Band Southwest **Zone** Beam

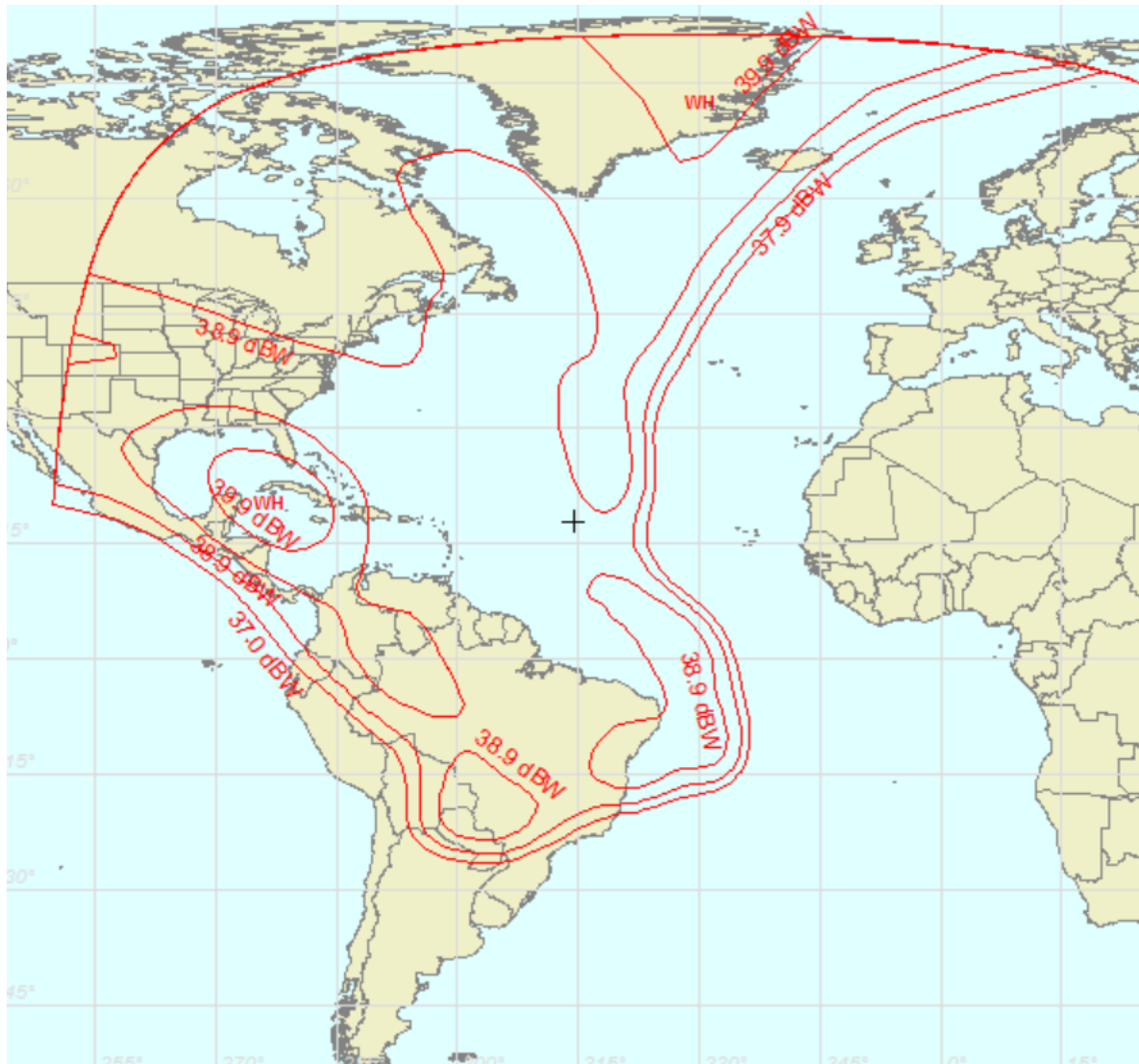


Figure 8: C-Band West Hemi Beam