



**INTELSAT.**

*Envision. Connect. Transform.*

October 2, 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 Galaxy 11 at 93.1° W.L. with New Beam Coverages; Call Sign: S2253

Dear Ms. Dortch:

IntelSat License LLC (“IntelSat”) herein requests grant of Special Temporary Authority (“STA”)<sup>1</sup> for 180 days, commencing upon grant, to operate the Galaxy 11 satellite’s (Call Sign S2253) Ku-band beams over a new coverage area in the communications frequencies 10.95-11.2 GHz, 11.7-12.2 GHz, and 13.75-14.5 GHz in order to provide customer service. Maps of the new beam coverages are enclosed as Exhibit A. IntelSat will be filing a license modification application to support these new service areas.

Galaxy 11 is permanently licensed to operate at 93.1° W.L. with different standard and extended Ku-band beam coverages than proposed herein.<sup>2</sup> IntelSat, pursuant to an identical 30-day STA request,<sup>3</sup> is already biasing the two Ku-band beams, the Standard Ku-band North America Beam and the Extended Ku-band North America Beam, in order to achieve the new coverage areas. All other Galaxy 11 beams are unaffected by this beam repointing. IntelSat’s continued operation of Galaxy 11 will conform to existing coordination agreements and the Federal Communications Commission’s (“Commission”) rules governing operations vis-à-vis adjacent locations.

---

<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-01383, File No. SAT-MOD-20181231-00095 (Apr. 19, 2019) (Public Notice).

<sup>3</sup> See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01411, File No. SAT-STA-20190822-00079 (Sept. 6, 2019) (Public Notice).

Ms. Marlene H. Dortch

October 2, 2019

Page 2

The continued temporary operation of the satellite's Ku-band beams with different coverage areas than authorized by its current license will allow Intelsat to meet customer demand for service while it seeks permanent authority. 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 (703) 559-6949.

Sincerely,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Senior Counsel  
Intelsat US LLC

cc: Stephen Duall  
Jay Whaley  
Jennifer Balatan