



October 2, 2019

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 Galaxy 12 at 129.0° W.L. with New Beam Coverage; Call Sign: S2422

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)¹ for 180 days, commencing upon grant, to operate the Galaxy 12 satellite’s (Call Sign S2422) C-band beams over a new coverage area in the communications frequencies 3700-4200 MHz in order to provide customer service. The beams will bias on a seasonal basis, and Intelsat will be filing a license modification application to support this new service area. The coverage requested herein is for winter operations. Maps of the new coverage areas are enclosed as Exhibit A.

Galaxy 12 is permanently licensed to operate at 129.0° W.L. with different C-band beam coverage than proposed herein.² Intelsat, pursuant to an identical 30-day STA request,³ is already biasing the satellite’s C-band beams in order to achieve the desired winter coverage area.⁴ Intelsat’s continued operation of Galaxy 12 will conform to existing coordination agreements and the Federal Communications Commission’s (“Commission”) rules governing operations vis-à-vis adjacent locations.

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 *Policy Branch Information, Actions Taken*, Report No. SAT-01311, File No. SAT-MOD-20180215-00017 (April 20, 2018) (Public Notice).

³ See *Satellite Policy Branch Information, Actions Taken*, Report No. 01417, File No. SAT-STA-20190829-00085 (Sept. 27, 2019) (Public Notice).

⁴ Galaxy 12 only has two beams—the North America H Beam and the North America V Beam.

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The continued temporary operation of the satellite's C-band beams with different coverage 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 with regard to this request to the undersigned at (703) 559-6949.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Jennifer Balatan