

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 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”)¹ for 180 days, commencing upon grant, to operate the Intelsat 904 satellite’s (Call Sign 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.² Intelsat, pursuant to an identical 30-day STA request,³ is already biasing all eight of the satellite’s C-band beams in order to achieve the new coverage areas.⁴ All other Intelsat 904 beams will operate within the currently licensed beam coverages. Intelsat’s continued operation of Intelsat 904 will conform to existing coordination agreements and the Federal

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-01405, File No. SAT-MOD-20190422-00031 (Aug. 2, 2019) (Public Notice).

³ See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01417, File No. SAT-STA-20190912-00091 (Sept. 27, 2019) (Public Notice).

⁴ Intelsat will bias the satellite platform in order to obtain the new C-band coverages.

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Communications Commission's ("Commission") rules governing operations vis-à-vis adjacent locations.

The continued temporary operation of the satellite's C-band beams with different coverages 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 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