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October 25, 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 Galaxy 12 at 129.0° W.L. with New Beam Coverage; Call Sign: S2422

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat² to operate Galaxy 12’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. Intelsat incorporates by reference Exhibit A of its original request, which contains maps of the new coverage areas.

Galaxy 12 is permanently licensed to operate at 129.0° W.L.³ with different C-band beam coverage than requested herein. The satellite’s C-band beams will continue to be biased in order to achieve the new coverage.⁴ Intelsat’s operations of Galaxy 12 will continue to 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 *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01417, File No. SAT-STA-20190829-00085 (Sept. 27, 2019) (Public Notice).

³ See *Policy Branch Information, Actions Taken*, Report No. SAT-01311, File No. SAT-MOD-20180215-00017 (April 20, 2018) (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 operation of Galaxy 12's C-band beams with different coverage than authorized by its current license will allow Intelsat to provide new customer 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 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

Attachment

Cc: Stephen Duall
Jay Whaley
Jennifer Balatan