



**INTELSAT.**

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October 31, 2019

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

Re: Request for Extension of 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 an additional 30 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted to Intelsat<sup>2</sup> to continue to operate Intelsat 904’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 has filed an identical request for 180 days of STA and will be filing a license modification application to support these new service areas.<sup>3</sup> Intelsat incorporates by reference Exhibit A of its original request, which contains maps of the new coverage areas.<sup>4</sup>

Intelsat 904 is permanently licensed to operate at 29.5° W.L. with different standard C-band beam coverages than requested herein.<sup>5</sup> Intelsat is seeking authority to continue to bias all eight of the

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

<sup>3</sup> See *Satellite Policy Branch Information, Space Station Applications Accepted for Filing*, Report No. SAT-01420, File No. SAT-STA-20191002-00107 (Oct. 11, 2019) (Public Notice).

<sup>4</sup> See *supra* n. 2.

<sup>5</sup> See *Policy Branch Information, Actions Taken*, Report No. SAT-01405, File No. SAT-MOD-20190422-00031 (Aug. 2, 2019) (Public Notice).

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satellite's C-band beams in order to achieve the new coverage areas.<sup>6</sup> All other Intelsat 904 beams will continue to operate within the currently licensed beam coverages. Intelsat's 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. The continued 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 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 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

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<sup>6</sup> Intelsat will bias the satellite platform in order to obtain the new C-band coverages.