



**INTELSAT.**

*Envision. Connect. Transform.*

November 6, 2019

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

Re: Request for Further Extension of 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 an additional 30 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted to Intelsat<sup>2</sup> to continue to operate Galaxy 11’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. Intelsat incorporates by reference Exhibit A of its original STA request, maps of the new beam coverage.<sup>3</sup> Intelsat has filed an identical request for 180 days of STA<sup>4</sup> and will be filing a license modification to support this coverage change.

---

<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-01424, File No. SAT-STA-20191008-00110 (Oct. 25, 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) at n. 2.

<sup>4</sup> See *Satellite Policy Branch Information, Space Station Applications Accepted for Filing*, Report No. SAT-01420, File No. SAT-STA-20191002-00105 (Oct. 11, 2019) (Public Notice).

Ms. Marlene H. Dortch

November 6, 2019

Page 2

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>5</sup> Intelsat is already biasing 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 remain unaffected by the 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.

The continued temporary operation of Galaxy 11'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 further STA extension request is in the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this further STA extension 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

---

<sup>5</sup> See *Policy Branch Information, Actions Taken*, Report No. SAT-01383, File No. SAT-MOD-20181231-00095 (Apr. 19, 2019) (Public Notice).