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November 13, 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 15 at 1575.42 MHz and 6639.27 MHz; Call Sign: S2387

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing December 3, 2019, to operate two currently unlicensed frequencies on Galaxy 15’s (Call Sign S2387) Wide Area Augmentation System (“WAAS”) payload.² Specifically, Intelsat seeks to operate in 1575.42 MHz and 6639.27 MHz in order to test ground segment equipment³ in preparation for of the launch of Galaxy 30 (Call Sign S3016),⁴ which also has a WAAS payload. The testing is expected to occur over a 30-day period.

Galaxy 15 is permanently licensed to operate at 133.0° W.L. in the 5925-6425 MHz and 3700-4200 MHz frequency bands.⁵ The satellite also has a WAAS payload that, until recently, was licensed by Leidos Innovations Corporation (“Leidos”). Leidos surrendered its license for the WAAS payload

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-00233, File No. SAT-LOA-19991207-00119 (Aug. 13, 2004) (Public Notice) (“Galaxy 15 Authorization”).

³ Intelsat will also be seeking 30-days of STA to operate its Napa, California C-band earth station (Call Sign E190127) for this testing.

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-01061, File No. SAT-LOA-20121025-00187 (Dec. 19, 2014) (Public Notice). Galaxy 30 is expected to launch in 2020.

⁵ See *Galaxy 15 Authorization*.

effective September 9, 2019.⁶ Intelsat is seeking STA to use only two frequencies on this WAAS payload.

Intelsat's proposed operation of the Galaxy 15 WAAS frequencies will be on a non-interference, non-protection basis and will conform with the Federal Communications Commission's ("Commission") rules governing operations vis-à-vis adjacent locations. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

Grant of this STA request will help ensure this antenna is operational prior to its use with Galaxy 30, which in turn will support the provision of WAAS service on Galaxy 30. As such grant 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

⁶ See Letter from Jeffrey E. Rummel, Attorney for Leidos, Inc., Arent Fox, to Marlene H. Dortch, Secretary, Federal Communications Commission, Surrender of Space Station License Effective September 9, 2019 – S2372, File No. SAT-LOA-19990427-00047 (September 4, 2019).