



INTELSAT.

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November 15, 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 10 at 47.5° E.L. with New Beam Coverage; Call Sign: S2382

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests grant of Special Temporary Authority (“STA”)¹ for 180 days, commencing upon grant, to continue operating the Intelsat 10 satellite’s (Call Sign S2382) Ku-band beam over a new coverage area in the communications frequencies 14250-14500 MHz and 12500-12750 MHz in order to provide customer service. A map of the new beam coverage is enclosed as Exhibit A. Intelsat 10 is currently operating with the requested coverage area under STA,² and has filed a license modification application to support this new service area.³

Intelsat 10 is permanently licensed to operate at 47.5° E.L. with a different Ku-band beam coverage than the beam coverage proposed herein.⁴ Intelsat is already biasing one of the satellite’s Ku-band

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, e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01419, File No. SAT-STA-20190925-00099 (Public Notice) (Oct. 4, 2019) (“30-day STA”). Intelsat has timely filed a further STA extension request, see Intelsat License LLC Application for 60-day Further Extension of Special Temporary Authority to Operate Intelsat 10 at 47.5 E.L. with New Beam Coverage, Call Sign S2382, File No. SAT-STA-20191025-00121 (filed Oct. 25, 2019).

³ See Intelsat License LLC Application to Modify Authorization for Intelsat 10 Satellite to Change C-band Ku-band Beam Coverage, Call Sign S2382, File No. SAT-MOD-20191008-00109 (filed Oct. 8, 2019).

⁴ See *Policy Branch Information; Actions Taken*, Report No. SAT-01173, File No. SAT-MOD-20160422-00038 (July 8, 2016) (Public Notice).

Ms. Marlene H. Dortch

November 15, 2019

Page 2

beams, the Europe Africa Beam, in order to achieve the new coverage.⁵ Intelsat's continued operation of Intelsat 10 will conform to existing coordination agreements and the Federal Communications Commission's ("Commission") rules governing operations vis-à-vis adjacent locations. All other beams will be unaffected by the Ku-band beam repointing.

The continued temporary operation of Intelsat 10's Ku-band beam with a different coverage than authorized by its current license provide new customer 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 (703) 559-6949.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Stephen Duall
Jay Whaley
Jennifer Balatan

⁵ See 30-day STA.

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Exhibit A

Exhibit A: Intelsat 10 Proposed Beam Coverage

