

November 25, 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 Intelsat 10 at 47.5° E.L. with New Beam Coverage; Call Sign: S2382

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days of Special Temporary Authority (“STA”)<sup>1</sup> to operate Intelsat 10’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.<sup>2</sup> In support of this request, Intelsat incorporates the map of the new beam coverage filed with its original request.<sup>3</sup> Intelsat has filed a 180-day request for STA<sup>4</sup> and a license modification application to support this new service area.<sup>5</sup>

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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, e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01419, File No. SAT-STA-20190925-00099 (Oct. 4, 2019) (Public Notice). 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).

<sup>3</sup> See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01387, File No. SAT-STA-20190418-00029 (May 3, 2019) (Public Notice) at Exhibit A.

<sup>4</sup> See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01428, File No. SAT-STA-20191115-00133 (Nov. 22, 2019) (Public Notice).

<sup>5</sup> See Intelsat License LLC’s Request to Modify Authorization for Intelsat 10 Satellite to Change C- and Ku-band Beam Coverage, File No. SAT-MOD-20191008-00109 (filed Oct. 8, 2019).

Intelsat 10 is permanently licensed to operate at 47.5° E.L. with a different Ku-band beam coverage than the beam coverage currently being used under STA.<sup>6</sup> One of the satellite's Ku-band beams, the Europe Africa Beam, has been biased in order to achieve the new coverage. Intelsat's operation of Intelsat 10 will continue to conform to existing coordination agreements and the Federal Communications Commission's ("Commission") rules governing operations vis-à-vis adjacent locations. All other beams are 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 will allow Intelsat to continue to provide customer service. 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 request. Please direct any questions 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> See *Policy Branch Information; Actions Taken*, Report No. SAT-01173, File No. SAT-MOD-20160422-00038 (July 8, 2016) (Public Notice).