



---

May 13, 2020

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 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 180 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted to Intelsat<sup>2</sup> to operate the Galaxy 11 satellite’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 request, which includes maps of the new beam coverages.<sup>3</sup> Intelsat will be filing a license modification application to support these new service areas.

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>4</sup> Intelsat is biasing the 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 are unaffected by this 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 the satellite’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 STA extension request is in the public interest.

---

<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-01429, File No. SAT-STA-20191002-00105 (Nov. 22, 2019) (Public Notice).

<sup>3</sup> *Id.*

<sup>4</sup> See *Policy Branch Information, Actions Taken*, Report No. SAT-01383, File No. SAT-MOD-20181231-00095 (Apr. 19, 2019) (Public Notice).

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 (703) 559-6949.

Sincerely,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Senior Counsel  
Intelsat US LLC

cc: Jay Whaley  
Jennifer Balatan