



September 10, 2020

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

**Re: Request for Further Extension of Special Temporary Authority to Operate
Galaxy 12 at 129.0° W.L. with New Beam Coverage; Call Sign: S2422**

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests an additional 60 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat² to operate the Galaxy 12 satellite's (S2422) C-band beams over a new coverage area in the communications frequencies 3700-4200 MHz in order to provide customer service. The beams will bias on a seasonal basis, and Intelsat has filed a license modification application to support this new service area.³ The coverage requested herein is to continue winter operations. Intelsat incorporates by reference Exhibit A of its original request,⁴ which contains maps of the new coverage areas.

Galaxy 12 is permanently licensed to operate at 129.0° W.L. with different C-band beam coverage than proposed herein.⁵ Intelsat is biasing the satellite's C-band beams in order to achieve the desired winter coverage area.⁶ Intelsat's continued operation of Galaxy 12 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 C-band beams with different coverage than authorized by its current license will allow Intelsat to meet customer demand for service while it

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-01492, File No. SAT-STA-20200812-00096 (Aug. 21, 2020) (Public Notice).

³ See Application of Intelsat License LLC to Modify Authorization for Galaxy 12, File No. SAT-MOD-20200909-00106 (filed Sept. 9, 2020).

⁴ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01429, File No. SAT-STA-20191002-00106 (Nov. 22, 2019) (Public Notice).

⁵ See *Policy Branch Information; Actions Taken*, Report No. SAT-01311, File No. SAT-MOD-20180215-00017 (Apr. 20, 2018) (Public Notice).

⁶ Galaxy 12 only has two beams—the North America H Beam and the North America V Beam.

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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 with regard to this request to the undersigned at (703) 559-6949.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Jay Whaley
Jennifer Balatan