



November 9, 2020

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

**Re: Request for Special Temporary Authority to Operate Intelsat 904 at 29.5° W.L. with New Beam Coverages; Call Sign: S2408**

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“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 Intelsat 904 satellite’s (Call Sign S2408) C-band beams over a new coverage area in the communications frequencies 3625-4200 MHz and 5850-6425 MHz in order to provide new customer service.<sup>3</sup> Intelsat has filed a license modification application to support these new service areas.<sup>4</sup>

Intelsat 904 is permanently licensed to operate at 29.5° W.L. with different standard C-band beam coverages than proposed herein.<sup>5</sup> Intelsat is biasing all eight of the satellite’s C-band beams in order to achieve the new coverage areas.<sup>6</sup> All other Intelsat 904 beams will operate within the currently licensed beam coverages. Intelsat’s continued operation of Intelsat 904 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 coverages than authorized by its current license will allow Intelsat to meet customer demand for service while it

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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-01479, File No. SAT-STA-20200513-00045 (July 2, 2020) (Public Notice).

<sup>3</sup> Intelsat incorporates by reference Exhibit A of its original request, which contains maps of the new beam coverages. See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01429, File No. SAT-STA-20191002-00107 (Nov. 22, 2019) (Public Notice).

<sup>4</sup> See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01507, File No. SAT-MOD-20200918-00111 (Oct. 23, 2020) (Public Notice).

<sup>5</sup> See *Policy Branch Information; Actions Taken*, Report No. SAT-01405, File No. SAT-MOD-20190422-00031 (Aug. 2, 2019) (Public Notice).

<sup>6</sup> Intelsat will bias the satellite platform in order to obtain the new C-band coverages.

**Intelsat US LLC**

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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 regarding 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