



January 14, 2021

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Re: Request for Special Temporary Authority  
Galaxy 30; Call Sign S3016  
**Expedited Treatment Requested**

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession (“Intelsat”), herein requests a grant of Special Temporary Authority (“STA”)<sup>1</sup> for 60 days, commencing January 21, 2021, to operate Galaxy 30 (S3016)<sup>2</sup> on-station at 125.0° W.L. consistent with the updated frequencies and technical information in its pending modification application.<sup>3</sup> Galaxy 30 was launched on August 15, 2020 and is expected to arrive on-station at 125.0° W.L. on January 21, 2021.

Specifically, Intelsat seeks to operate:

- (1) in the following telemetry, tracking, and control frequencies: 6421.75 MHz and 6424.25 MHz (Earth-to-space), and 4197.5 MHz and 4198.5 MHz (space-to-Earth);
- (2) in the following Wide Area Augmentation System (“WAAS”) frequency bands: 6598.58-6618.58 MHz and 6649.73-6669.73 MHz (Earth-to-space), and 1166.45-1186.45 MHz and 1565.42-1585.42 MHz (space-to-Earth);
- (3) in the 27600-28600 MHz<sup>4</sup> frequency band in addition to the communications bands already authorized in the *Galaxy 30 License*;

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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 *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01359, File No. SAT-AMD-20180410-00026 (Nov. 16, 2018) (Public Notice) (“*Galaxy 30 License*”).

<sup>3</sup> See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01493, SAT-MOD-20200805-00091 (Aug. 28, 2020) (Public Notice) (“*Modification Application*”). In support of this STA request, Intelsat incorporates by reference the *Modification Application*.

<sup>4</sup> Intelsat is aware that geostationary satellite orbit fixed satellite services (“FSS”) operations in the 27500-28350 MHz band are secondary to the Upper Microwave Flexible Use Service, except for FSS operations associated with earth stations authorized pursuant to §25.136. See 47 C.F.R. § 25.202(a)(1)(i).

(4) consistent with the updated technical information provided in the Galaxy 30 pending *Modification Application*.<sup>5</sup>

Additionally, Intelsat seeks a waiver of the Table of Allocations for use of the 12750-13250 MHz band at 125.0° W.L. for the reasons set forth in the *Modification Application*.<sup>6</sup>

Grant of this STA request will not result in increased risk of harmful interference. Intelsat will operate Galaxy 30 at 125.0° W.L. in conformance with relevant coordination agreements concerning the 125.0° W.L. location.

Grant of this STA request will allow Intelsat to safely station-keep Galaxy 30 at 125.0° W.L.; transfer traffic from Galaxy 14 (S2385)<sup>7</sup> to Galaxy 30; and ensure that Galaxy 30 is able to operate consistent with the capabilities of the spacecraft, thereby providing optimal service to customers at the 125.0° W.L. orbital location. Grant of this STA request therefore serves the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Federal Communications Commission grant this request.

Sincerely,

/s/ Cynthia J. Grady  
Cynthia J. Grady  
Assistant General Counsel  
Intelsat US LLC

cc: Merissa Velez  
Jay Whaley  
Jennifer Balatan

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<sup>5</sup> In the *Modification Application*, Intelsat (1) updates the maximum downlink effective isotropic radiated power in the 1559-1610 MHz and 1151-1214 MHz frequency bands; (2) updates the bandwidth of the WAAS payload; (3) adds a new ULPC beacon at 4199.95 MHz; (4) updates the receiving C-band Channel 23 bandwidth to 43 MHz; and (5) updates the GXT/GIMS file for the C-band G/T uplink in Schedule S. See *Modification Application* at Engineering Statement and Schedule S.

<sup>6</sup> See *id.* at 3-5.

<sup>7</sup> See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-00340, File No. SAT-MOD-20051206-00261 (Jan. 27, 2006) (Public Notice). Galaxy 30 is a replacement satellite for Galaxy 14.