



November 2, 2022

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

Re: Request for Special Temporary Authority to Operate Galaxy 33 Consistent with
Pending Modification Application; Call Sign: S3015

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA")¹ commencing November 4, 2022, to operate Galaxy 33 at the 133.0° W.L. orbital location using frequencies, coverages, and technical parameters consistent with its pending modification application, which Intelsat hereby incorporates by reference.² Galaxy 33 was launched on October 8, 2022, and is expected to be placed into service on November 4, 2022.

Galaxy 33 is a licensed C-/Ku-/Ka-band satellite³ that is replacing Galaxy 15⁴ as part of Intelsat's C-band transition.⁵ Intelsat's pending modification application reflects a post-grant design change and seeks to (1) add the 19630-19700 MHz band for communications and to remove and modify conditions related to the surrendered 10950-11200 MHz frequency band; and (2) to operate telemetry, tracking, and command ("TT&C") anywhere within the 3700-4200 MHz (space-to-Earth) and 5925-6425 MHz (Earth-to-space) bands in 100 kHz steps consistent with the satellite's

¹ Intelsat has filed this STA request, an FCC Form 159, and filing fee electronically via the International Bureau's Filing System.

² See Intelsat License LLC, Application to Modify Authorization for Galaxy 33, File No. SAT-MOD-20220822-00092 (filed Aug. 22, 2022) ("Galaxy 33 Modification").

³ See *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01314, File Nos. SAT-LOA-20170524-00078 and SAT-AMD-20170613-00086 (May 11, 2018); *Satellite Policy Branch Information, Actions Taken*, Report No. SAT-01326, File Nos. SAT-LOA-20170524-00078 and SAT-AMD-20170613-00086 (June 29, 2018); (re-issuing grant conditions to include the clarification to Condition 19 requested by O3b Limited).

⁴ Galaxy 15 suffered an anomaly and as a result is currently drifting away from 133 W.L. Intelsat continues to work to regain commanding of the satellite. See, e.g., Intelsat License LLC, Request for Special Temporary Authority, File No. SAT-STA-20221012-00133 (filed Oct. 12, 2022).

⁵ See Letter from Michelle V. Bryan, Executive Vice President, General Counsel and Chief Administrative Officer, Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 18-122 and 20-173, at 18-19 (Aug. 14, 2020).

tunable design and with the *C-band Order*.⁶ The modification also updates technical information and the resulting beam coverages.

Specifically, Intelsat seeks special temporary authority to operate in the following frequencies in the coverage areas provided in the modification application:⁷

- TT&C⁸
 - 4198.75 MHz and 4199.75 MHz (space-to-Earth); and
 - 6421.50 MHz and 6424.50 MHz (Earth-to-space).
- Communications
 - 3700-4200 MHz, 11450-12200 MHz, 17800-19300 MHz, and 19630-20200 MHz (space-to-Earth); and
 - 5925-6425 MHz, 13750-14500 MHz, 27500-29100 MHz, 29250-30000 MHz (Earth-to-space).

Grant of this request will serve the public interest by enabling Intelsat to begin providing customer service with Galaxy 33 consistent with the satellite's design, use more efficient technical parameters, expand the coverage to serve customers in additional areas visible from the 133.0° W.L. orbital location.⁹ This, in turn, will allow Intelsat to replace Galaxy 15, meet existing and future customer demands at 133.0° W.L, and further Intelsat's portion of the C-band transition.¹⁰

Further, grant of this STA request will not result in increased risk of harmful interference. Intelsat will operate Galaxy 33 at 133.0° W.L. in conformance with applicable coordination agreements and the FCC rules governing operations vis-à-vis adjacent locations. Should any interference occur, Intelsat will take all reasonable steps to eliminate such interference.

Finally, Intelsat requests the STA sought herein based on the recommendation of FCC staff. As such, grant of this STA on less than three working days' advance notice is appropriate.

⁶ See *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343, 2391 ¶ 112 (2020) ("*C-band Order*"); 47 C.F.R. § 2.106, NG182. Following the completion of the Federal Communications Commission's ("FCC" or "Commission") C-band transition, the Galaxy 33 satellite will provide service in the 3700-4000 MHz band only to earth stations outside the contiguous United States or to Intelsat's two consolidated TT&C/gateway sites in Brewster, Washington and Andover, Maine. Intelsat has sought reconsideration to allow its continued access to 500 MHz at these consolidated international TT&C/Gateway sites on a protected basis to ensure C-band service continuity to customers on its international C-band satellites. See Intelsat License LLC Petition for Reconsideration, GN Docket No. 18-122 (May 26, 2020).

⁷ See Galaxy 33 Modification.

⁸ For purposes of this request for STA, Intelsat seeks to operate these specific TT&C frequencies rather than the tunable TT&C requested in the pending modification application.

⁹ Specifically, the newly requested 19630-19700 MHz band will be used to serve a customer in Alaska, thus providing much needed expansion capacity.

¹⁰ See generally, Transition Letter; *C-band Order*.

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For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request. Please direct any questions regarding this request to the undersigned at (703) 559-6949.

Sincerely,

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

cc: Merissa Velez
Jennifer Balatan