

March 13, 2023

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

Re: Request for Further 60-day Extension of Special Temporary Authority to Operate
Intelsat 10 at 177.8° E.L.; Call Sign: S2382
Expedited Treatment Requested

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60 days of Special Temporary Authority ("STA"),¹ beginning March 16, 2023, to Intelsat to operate Intelsat 10 (S2382) at 177.8° E.L.² Intelsat has filed an application for permanent authority to operate at this new location.³

On-station at 177.8° E.L., Intelsat 10's frequencies are as follows:

- Telemetry, tracking, and control ("TT&C"):
 - 14000.5 MHz and 14499.5 MHz (uplink);
 - 11699.0 MHz, 12747.5 MHz, 12748.5 MHz, and 12749.5 MHz (downlink).
- Communications:
 - 5925-6425 MHz and 14000-14500 MHz (uplink);
 - 3700-4200 MHz, 11450-11700 MHz, and 12250-12750 MHz (downlink).

At 177.8° E.L., the satellite's coverage areas for all beams are: western United States, Pacific Ocean region, eastern Asia, northern Asia, and Oceania.

Grant of this further STA extension request will not result in increased risk of harmful interference. Intelsat will continue to operate Intelsat 10's communications payload and TT&C frequencies at 177.8° E.L. in conformance with existing coordination agreements and the Federal Communications Commission's ("FCC") rules governing operations vis-à-vis adjacent locations.

¹ Intelsat has filed this STA request, an FCC Form 159, and a \$1,600.00 filing fee electronically via the International Bureau's Filing System.

² See, e.g., *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01701, File No. SAT-STA-20220912-00105 (Feb. 17, 2023) (Public Notice). Per condition 6 of the stamp grant, Intelsat has filed a modification application for permanent authority to operate at 177.8° E.L.

³ See Intelsat License LLC, Application to Modify Authorization for Intelsat 10, File No. SAT-MOD-20230310-00053 (filed Mar. 10, 2023).

Should any interference occur, Intelsat will take all reasonable steps to eliminate such interference.

Additionally, Intelsat respectfully requests waiver of the three-day prior filing requirement of 47 C.F.R. § 25.120(a). The prior STA expires on March 15, 2023,⁴ but due to an administrative oversight, this further STA extension was not timely filed. Intelsat has taken measures to avoid this error in the future. The Commission may grant a waiver for good cause shown.⁵ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁶ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁷ Grant of the requested waiver would serve the public interest by ensuring continuity in service for the new capacity at the 177.8° E.L. orbital location, which the satellite has already been providing by STA.

Grant of this further STA extension request is in the public interest because it will allow Intelsat to continue providing new capacity from the 177.8° E.L. orbital location.

For the reasons set forth herein, Intelsat respectfully requests that the FCC grant this expedited further STA extension request. Please direct any questions regarding this request to the undersigned at (703) 559-7799.

Sincerely,

/s/ W. Ray Rutngamlug

W. Ray Rutngamlug
Associate General Counsel
Intelsat US LLC

cc: Alyssa Roberts
Jennifer Balatan
Jay Whaley

⁴ *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01701, File No. SAT-STA-20220912-00105 (Feb. 17, 2023) (Public Notice).

⁵ 47 C.F.R. § 1.3.

⁶ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

⁷ *WAIT Radio v. FCC*, 419 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.