



May 22, 2023

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

Re: Request for Special Temporary Authority to Operate in the 18.8-19.3 GHz
and 28.6-29.1 GHz Bands, Call Sign S3066

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests grant of Special Temporary Authority ("STA")¹ for 30 days, commencing immediately upon grant, to operate Intelsat 40e (S3066) in the 18.8-19.3 GHz and 28.6-29.1 GHz bands.² Intelsat intends to file a modification application to support the operations requested in this request.

Intelsat 40e is authorized by license to operate at the 91.0° W.L. orbital location in Ku/Ka-bands;³ the grant of authority deferred action on Intelsat's request to operate in the 18.8-19.3 GHz and 28.6-29.1 GHz bands.⁴ Intelsat 40e launched on April 7, 2023, and the satellite is currently undergoing in orbit testing of its communications payload at 91.0° W.L.⁵ Intelsat seeks authority to

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 Pursuant to Footnote NG165 of the U.S. Table of Frequency Allocations, "geostationary-satellite networks in the fixed-satellite service shall not cause harmful interference to, or claim protection from, non-geostationary-satellite systems ("NGSO") in the fixed-satellite service" in the 18.8-19.3 GHz and 28.6-29.1 GHz bands." 47 C.F.R. § 2.106, n. NG165.

³ See *Policy Branch Information, Actions Taken*, Report No. SAT-01713, File Nos. SAT-LOA-20200413-00035, SAT-AMD-20220408-00039 (Mar. 31, 2023) (Public Notice) ("*Intelsat 40e Authorization*").

⁴ See *Application for Authority to Launch and Operate Intelsat 40e at 91.0° W.L.*, Stamp Grant, File Nos. SAT-LOA-20200413-00035, SAT-AMD-20220408-00039, at Condition 16 (IB 2023) ("*Intelsat 40e Stamp Grant*") (deferring "authorization for operations by Intelsat 40e in these frequency bands pending approval by the [Federal Communications Commission ("Commission")] of an amended application that includes either: (1) certifications that Intelsat has completed technical coordination with all [non-geostationary orbit ("NGSO")] satellite system operators licensed or granted U.S. market access to operate in those bands, or (2) a detailed technical demonstration[] of how Intelsat will protect the NGSO [fixed satellite service "FSS"] satellite systems licensed or granted U.S. market access to operate in those bands.").

⁵ See *Policy Branch Information, Actions Taken*, Report No. SAT-01722, File No. SAT-STA-20230412-00086 (May 5, 2023) (Public Notice); *Intelsat 40e Authorization*.

operate in the 18.8-19.3 GHz and 28.6-29.1 GHz bands to provide customer service once IOT is complete.

Intelsat has coordinated Intelsat 40e's operations in the 18.8-19.3 GHz and 28.6-29.1 GHz bands with all operational Ka-band NGSO FSS systems licensed or granted U.S. market access by the Commission.⁶ Intelsat's proposed operation of Intelsat 40e will also conform to applicable Federal Communications Commission's ("Commission") rules. In the unlikely event that interference should occur, Intelsat will take all reasonable steps to eliminate such interference.

Intelsat Stop Buzzer Contact:

24x7 Intelsat Network Operations Center: +1 404-381-2900
Director, Network Operations Center (NOC): Angela Wheeler
Address: 2875 Fork Creek Church Road Ellenwood, GA 30294-1224 USA
Email: angela.wheeler@intelsat.com
Office: + 1 404-381-2820
Mobile: +1 202-437-1619

Grant of this STA request is in the public interest because it will enable Intelsat to provide robust service to customers without causing harmful interference to operational Ka-band NGSO FSS systems. Intelsat 40e will provide high-speed capacity for Intelsat's business-, government-, and commercial-aviation customers coast to coast, as well as deliver services to a variety of additional market segments, including industrial, maritime, and enterprise customers. To maximize customer operations in the Ku-band band, Intelsat will rely on 18.8-19.3 GHz and 28.6-29.1 GHz band spectrum for gateway connectivity.

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

Respectfully submitted,

/s/ W. Ray Rutngamlug
W. Ray Rutngamlug
Associate General Counsel
Intelsat US LLC

Cc: Merissa Velez

⁶ Specifically, Intelsat has completed frequency coordination with Space Exploration Holdings, LLC (Call Signs S2983, S3018, and S3069), WorldVu Satellites Limited d/b/a OneWeb (Call Sign S2963), and O3b Limited (Call Signs S2995 and S2935).