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



Re: Request for Extension of Special Temporary Authority Clarksburg, Maryland Earth Station KA258

Dear Ms. Dortch:

Intelsat North America LLC ("Intelsat") herein requests a 30-day extension -through May 13, 2010 -- of the Special Temporary Authority ("STA")<sup>1</sup>
previously granted Intelsat to use its Clarksburg, Maryland Ku-band earth
station -- call sign KA258 -- to provide telemetry, tracking and command
("TT&C") services for the Intelsat 16 satellite at its permanent location of
58.10° W.L.<sup>2</sup> Intelsat has a pending application to modify the KA258 license
to add 58.10° W.L. as a point of communication.<sup>3</sup>

Intelsat 16 was launched on February 11, 2010 and has commenced operations at 58.10 W.L. <sup>4</sup> The Intelsat 16 TT&C operations will continue to be performed at 58.10° W.L. in the following frequency bands: 13997.5 MHz and 14499.5 MHz in the uplink and 12198.25 MHz and 12198.75 MHz in the downlink. Intelsat will continue to operate the TT&C transmissions in conformance with its coordination agreements for the nominal 58.0° W.L. location, as well as with the FCC's rules designed to allow co-frequency operations in a two-degree separation environment.

Operations in the 14499.5 MHz, 12198.25 MHz and 12198.75 MHz frequencies will continue to be consistent with the antenna's licensed

<sup>&</sup>lt;sup>1</sup> Intelsat has filed its STA request, an FCC Form 159, a \$175.00 filing fee and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

<sup>&</sup>lt;sup>2</sup> See Policy Branch Information; Actions Taken, Report No. SES-02227, File No. SES-STA-20100127-00125, (Mar. 17, 2010) (Public Notice).

<sup>&</sup>lt;sup>3</sup> See Intelsat North America LLC Application to Modify KA258 License, File No. SES-MFS-20100129-00134 (filed Jan. 29, 2010).

<sup>&</sup>lt;sup>4</sup> See Policy Branch Information; Actions Taken, Report No. SAT-00610, File No. SAT-LOA-20080416-00085 (June 5, 2009) (Public Notice); Letter from Susan H. Crandall, Intelsat Corporation, to Marlene H. Dortch, Federal Communications Commission (Mar. 31, 2010) (noting that Intelsat 16 commenced service as of March 19, 2010).

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parameters. With respect to operations in the 13997.5 MHz frequency, Intelsat herein incorporates by reference the Exhibit A supplied with the original STA request, which contains technical information that demonstrates that the operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility.<sup>5</sup> In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

The continued provision of TT&C services to the Intelsat 16 satellite at 58.10° W.L. is critical to ensure the safe station-keeping of the satellite at that location. This, in turn, results in additional capacity at the nominal 58.0° W.L. location and thereby promotes the public interest.

Please direct any questions regarding this STA extension request to the undersigned at (202) 944-7848.

Respectfully submitted,

Susan H. Crandall

Assistant General Counsel

**Intelsat Corporation** 

Cc: Kathyrn Medley

<sup>&</sup>lt;sup>5</sup> The EIRP levels for transmissions in the 13997.5 MHz frequency will continue to be consistent with the antenna's licensed parameters.