

February 1, 2017

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

Re: Request for Further Extension of Special Temporary Authority
Hagerstown, Maryland Earth Station E140121

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days of the Special Temporary Authority (“STA”)¹ previously granted Intelsat to use its Hagerstown, Maryland Ku-band earth station—call sign E140121—to continue providing telemetry, tracking, and command (“TT&C”) services to Intelsat 31 at 95.05° W.L.² The IOT and drift of Intelsat 31 are complete and the satellite arrived on-station at 95.05° W.L. on July 26, 2016.³ Intelsat is seeking to modify the E140121 license to include TT&C communications with Intelsat 31.⁴

The proposed operations will continue to be performed using the following frequencies: 13998.50 MHz and 14006.00 MHz in the uplink (LHCP, H); and 11194.25 MHz, 11195.50 MHz, 11196.25 MHz, and 11196.75 MHz in the downlink (RHCP, V). The proposed TT&C operations at 95.05° W.L. will be consistent with Intelsat’s coordination agreements for the nominal 95° W.L. location. All operators of potentially affected satellites will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

In further support of this further extension request, Intelsat incorporates by reference Exhibit A of its initial 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

¹ Intelsat has filed its STA request, an FCC Form 159, a \$200.00 filing fee, and this supporting letter electronically via the International Bureau’s Filing System (“IBFS”).

² Intelsat’s previous STA requests also included TT&C during in-orbit testing (“IOT”) at 132.0° W.L and the drift to 95.05° W.L., which are now complete. *See e.g. Satellite Communications Services information; Actions Taken*, Report No. SES-01910, File No. SES-STA-20160927-00809 (Dec. 7, 2016) (Public Notice).

³ *See* Letter from Susan H. Crandall, Counsel for Intelsat Corporation, to Ms. Marlene H. Dortch, FCC, File No. SAT-LOA-20140410-00038 (July 26, 2016).

⁴ *See Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, Report No. SES-01894, File Nos. SES-MOD-20160620-00555 and SES-AMD-20160927-00803 (Oct. 12, 2016) (Public Notice).

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interference into any lawfully operating terrestrial facility, or into Federal systems operating in the 13.75-14.00 GHz band. 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.

Grant of this STA further extension request will allow Intelsat to continue to safely station-keep the Intelsat 31 satellite. This, in turn, will provide additional capacity to customers at the 95.05° W.L. orbital location and thereby promotes the public interest.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

A handwritten signature in blue ink that reads "Cynthia J. Grady". The signature is written in a cursive style.

Cynthia J. Grady
Regulatory Counsel
Intelsat Corporation

cc: Paul Blais