

November 9, 2017

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

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

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary of Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to use its Hagerstown, Maryland Ku-band earth station—call sign KA258—to provide telemetry, tracking, and command (“TT&C”) services for Intelsat 16 (S2750)<sup>2</sup> during its drift from 58.1° W.L to 76.2° W.L. and on-station at 76.2° W.L.<sup>3</sup> Intelsat seeks this STA extension in order to continue assisting a customer in responding to the damage caused by Hurricane Maria to the communications networks in Puerto Rico. Intelsat arrived on-station at 76.2° W.L. on October 30, 2017.

TT&C operations will continue to be performed in the following frequencies: 12198.25 MHz, 12198.75 MHz, 13997.5 MHz, and 14499.5 MHz. Intelsat also has a pending 180-day STA request for TT&C services at 76.2° W.L.<sup>4</sup>

The proposed TT&C operations at 76.2° W.L. will be consistent with Intelsat’s coordination agreements for the nominal 76.2° W.L. orbital location. In the unlikely event that harmful interference occurs, Intelsat will take all necessary steps to eliminate the interference.

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

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<sup>1</sup> 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”).

<sup>2</sup> See *Satellite Communications Services Information; Actions Taken, Report No. SES-02003*, File No. SES-STA-20171016-01173 (Oct. 25, 2017) (Public Notice).

<sup>3</sup> See *Satellite Policy Branch Information; Actions Taken*, File No. SAT-STA-20171016-00139 (Oct. 20, 2017) (Public Notice). Intelsat also has a pending 180-day STA request to drift and operate Intelsat 16 at 76.2° W.L. See *Satellite Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01279, File No. SAT-STA-20171016-00140 (Oct. 27, 2017) (Public Notice).

<sup>4</sup> See *Satellite Communications Services; Satellite Radio Applications Accepted for Filing, Report No. SES-02002*, File No. SES-STA-20171016-01172 (Oct. 25, 2017) (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 extension request will allow Intelsat to continue to provide critical communication services in Puerto Rico from the 76.2° W.L. orbital location. Accordingly, grant of this STA extension request is in the public interest.

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

Respectfully submitted,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais