

March 9, 2018

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 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 Authority ("STA")¹ previously granted Intelsat to use its Hagerstown, Maryland Ku-band earth station—call sign KA258—to provide launch and early orbit phase ("LEOP") services, as well as telemetry, tracking, and command ("TT&C") services during in-orbit testing ("IOT") at 26.0° W.L.,² for the Hispasat 1F satellite. Hispasat 1F, after an unexpected delay, was launched on March 6, 2018.³ Intelsat expects the LEOP and TT&C during IOT period to last approximately 30 days.

The Hispasat 1F LEOP and TT&C during IOT operations will be performed at the following frequencies: 13997.5 MHz (RHCP) in the uplink; and 10701.0 MHz and 11448.0 MHz (RHCP) in the downlink. The LEOP and TT&C operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path or could be potentially affected at the IOT location. All operators of satellites in that path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs.

The 24x7 contact information for the Hispasat 1F LEOP and TT&C during IOT mission is as follows:

Ph.: (703) 559-7701 – East Coast Operations Center (primary) (310) 525-5591 – West Coast Operations Center (back-up)

Request to speak with Harry Burnham or Kevin Bell.

<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>&</sup>lt;sup>2</sup> See Satellite Communications Services Information; Actions Taken, Public Notice, Report No. SES-02031, File No. SES-STA-20180105-00013 (Jan. 31, 2018) (Public Notice).

<sup>&</sup>lt;sup>3</sup> The in-orbit testing location for Hispasat 1F, which Intelsat understands is licensed by Spain, will be 26.0° W.L. The final location of Hispasat 1F will be 30° W.L.

<sup>&</sup>lt;sup>4</sup> SSL, the manager of the Hispasat 1F LEOP and TT&C during the IOT mission, will handle the coordination.

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In further support of this extension request, Intelsat incorporates by reference Exhibits A and B that contain a 13 GHz report and waiver requests, which were included with the original STA request.<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.

Finally, Intelsat clarifies that throughout the Hispasat 1F LEOP and TT&C during IOT mission, SSL will serve as the mission manager. SSL will build and send the commands to the Intelsat antenna, which will process and execute the commands. Telemetry received by Intelsat will be forwarded to SSL. Intelsat will perform the ranging sessions by sending a tone to the spacecraft periodically. Intelsat will remain in control of the baseband unit, RF equipment, and antenna.

Grant of this STA extension request will allow Intelsat to help launch Hispasat 1F and safely station-keep the satellite during IOT. This, in turn, will help provide additional capacity from the 30.0° W.L. orbital location and thereby promotes the public interest.

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

Respectfully submitted,

Cynthia J. Fady

Cynthia J. Grady Regulatory Counsel

**Intelsat Corporation** 

cc: Paul Blais

<sup>&</sup>lt;sup>5</sup> See supra n. 2.