

May 11, 2018

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

Re: Request for Special Temporary Authority  
Mountainside, Maryland Earth Station KA258  
**EXPEDITED TREATMENT REQUESTED**

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests 30 days of expedited Special Temporary Authority (“STA”),<sup>1</sup> commencing May 20, 2018, to use its Mountainside, Maryland Ku-band earth station—call sign KA258—to provide telemetry, tracking, and command (“TT&C”) services for Intelsat 9 (Call Sign S2380) during its drift from 29.5° W.L. to 66.15° E.L.<sup>2</sup> The drift is expected to take approximately eight months.

Intelsat is seeking expedited treatment because the traffic transfer from Intelsat 9 to Intelsat 901 will be completed ahead of schedule, which allows for the acceleration of Intelsat 9’s redeployment. This will, in turn, allow Intelsat 9 to provide additional capacity at 66.15° E.L. at an earlier date than previously anticipated.

TT&C operations will be performed in the following frequencies: 14.0005 GHz and 14.4945 GHz in the uplink; and 11.7005 GHz and 11.702 GHz in the downlink. The drift operations will be coordinated with all operators of satellites that use the same frequency bands and are in the drift path.<sup>3</sup> 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. 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.

---

<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 *Intelsat License LLC*, Application to Modify Authorization for Intelsat 9 (Call Sign S2380), File No. SAT-MOD-20180305-00019 (filed Mar. 5, 2018); See *Intelsat License LLC*, Request for Special Temporary Authority to Drift Intelsat 9 to 66.15 E.L., Call Sign S2380, File No. SAT-STA-20180509-00041 (filed May 9, 2018).

<sup>3</sup> Intelsat will handle the coordination.

Ms. Marlene H. Dortch  
May 11, 2018  
Page 2

The 24x7 contact information 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.

Grant of this STA request will allow Intelsat to drift Intelsat 9 to its new location. This, in turn, will add additional capacity at the 66.15° E.L. orbital location and thereby promotes the public interest.

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

Respectfully submitted,

*/s/ Cynthia J. Grady*

Cynthia J. Grady  
Regulatory Counsel  
Intelsat Corporation

cc: Paul Blais