

December 17, 2018

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 KA258

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 days of Special Temporary Authority ("STA")¹ to use its Hagerstown, Maryland Ku-band earth station—call sign KA258—to provide telemetry, tracking, and command ("TT&C") services² for Intelsat 5 (Call Sign S2704) on station at 137.0° W.L.³ Intelsat 5 arrived at 137.0° W.L. on May 30, 2018.⁴

TT&C operations will continue to be performed in the following frequencies: 14498 MHz (H) and 13999 MHz (RHCP) in the uplink; and 11451 MHz (H, V, and RHCP), 11452 MHz (H, V, and RHCP), and 11454 MHz (RHCP, and LHCP) in the downlink. On-station at 137.0° W.L., Intelsat will continue operate in conformance with FCC rules and any relevant coordination agreements.

¹ Intelsat has filed its STA request, an FCC Form 159, a \$210.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System ("IBFS").

² See, e.g. Satellite Communications Services Information; Actions Taken, Report No. SES-02119, Fil No. SES-STA-20181024-03238 (Dec. 5, 2018) (Public Notice); Satellite Communications Services Information; Actions Taken, Report No. SES-02102, File No. SES-STA-20180924-02814 (Oct. 3, 2018) (Public Notice). Intelsat's original STA request included drift authority. See Satellite Communications Services Information; Actions Taken, Report No. SES-02064, File No. SES-STA-20180504-00490 (May 23, 2018) (Public Notice).

³ See Policy Branch Information; Actions Taken, Report No. SAT-01361, File No. SAT-MOD-20180501-00036 (Nov. 30, 2018) (Public Notice).

⁴ Intelsat is also utilizing the following antennas on station for Intelsat 5: KL92, E060384, and E140121.

Ms. Marlene H. Dortch December 17, 2018 Page 2

In further support of this request, Intelsat incorporates by reference Exhibit A submitted with its original STA request,⁵ 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, 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 safely station-keep Intelsat 5 at its new location. This, in turn, will help meet a new service demand at the 137.0° W.L. orbital location and thereby promotes the public interest.

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

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady Senior Counsel Intelsat US LLC

cc: Paul Blais

⁵ See Satellite Communications Services Information; Actions Taken, Report No. SES-02064, File No. SES-STA-20180504-00490 (May 23, 2018) (Public Notice).