



**INTELSAT.**

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January 29, 2019

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  
Ellenwood, Georgia Earth Station E980502

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted Intelsat to use its Ellenwood, Georgia Ku-band earth station—call sign E980502—to provide telemetry, tracking, and command (“TT&C”) services<sup>2</sup> for Intelsat 16 (S2750) while on-station at 76.2° W.L.<sup>3</sup> Intelsat seeks this STA further extension in order to continue assisting a customer in responding to the damage caused by Hurricane Maria to the communications networks in Puerto Rico.<sup>4</sup> Intelsat has a pending application to permanently license this antenna.<sup>5</sup>

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. The operations at 76.2° W.L. will continue to 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.

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<sup>1</sup> 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”).

<sup>2</sup> See, e.g. *Satellite Communications Services Information; Actions Taken*, Report No. SES-02122, File No. SES-STA-20181126-03336 (Dec. 12, 2018) (Public Notice).

<sup>3</sup> See, e.g. *Intelsat License LLC, 30-Day STA Extension Request to Temporarily Operate Intelsat 16 With a New Coverage Area (Call Sign S2750)*, File No. SAT-STA-20190128-00002 (filed Jan. 28, 2019).

<sup>4</sup> Intelsat is also utilizing the following antennas for Intelsat 16 TT&C operations: E140121, KA258, E030096, and E060384.

<sup>5</sup> See *Intelsat License LLC, Modification of Ellenwood, Georgia Earth Station License (E980502) to add Intelsat 16 (S2750) as Point of Communication*, File No. SES-MFS-20180919-02756 (filed September 19, 2018).

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In further support of this further extension request, Intelsat incorporates by reference Exhibit A submitted with its original STA request,<sup>6</sup> 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 further extension request will allow Intelsat to continue safety station keep Intelsat 16 while providing 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 further 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  
Senior Counsel  
Intelsat US LLC

cc: Paul Blais

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<sup>6</sup> See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02093, File No. SES-STA-20180806-02128 (Sept. 5, 2018) (Public Notice).