



INTELSAT.

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August 6, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Request for Extension of Special Temporary Authority
Ellenwood, Georgia Earth Station E170122

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat to use its Ellenwood, Georgia Ku-band earth station (Call Sign E170122) to provide launch and early orbit phase (“LEOP”) services for the AMOS-17 satellite.² AMOS-17 was originally expected to launch on July 10, 2019, and is now expected to launch no earlier than August 6, 2019.³ Intelsat expects the LEOP period to last approximately 6 days.⁴

The AMOS-17 operations will be performed at the following frequencies: 14497.5 MHz and 14499.5 MHz (RHCP) in the uplink; and 11449.0 MHz and 11699.5 MHz (LHCP) in the downlink. The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands

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

² See *Satellite Communications Services Information, Actions Taken*, Report No. SES-02173, File No. SES-STA-20190521-00659 (Public Notice) (June 19, 2019).

³ The in-orbit testing location for AMOS-17, which Intelsat understands is licensed by Israel, will be 13.8° E.L. The satellite’s final location will be 17.0° E.L.

⁴ Intelsat also has authority to use KA258 to support the AMOS-17 LEOP mission. See *Application of Intelsat License LLC for Grant of Special Temporary Authority for Hagerstown, Maryland Earth Station KA258*, File No. SES-STA-20190521-00633 (granted Aug. 1, 2019).

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and are in the LEOP path.⁵ 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 AMOS-17 LEOP 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.

In further support of this request, Intelsat incorporates by reference Exhibit A, a waiver request, included with its original request.⁶ 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 during the AMOS-17 LEOP mission, Boeing will serve as the mission manager. Boeing 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 Boeing. 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 the AMOS-17 satellite. This will help provide communication services to Africa at the 17.0° E.L. location and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Federal Communications 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
Senior Counsel
Intelsat US LLC

cc: Paul Blais

⁵ Boeing, the manager of the AMOS-17 mission, will handle the coordination.

⁶ See *supra* n. 2 at Exhibit A.