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September 3, 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
Riverside, California Earth Station E060384

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days of Special Temporary Authority (“STA”)¹ previously granted Intelsat to use its Riverside, California Ku-band earth station (Call Sign E060384) to continue providing telemetry, tracking, and command (“TT&C”) services for Intelsat 5 (Call Sign S2704) on-station at 137.0° W.L.² Intelsat has filed an application to permanently modify this earth station license.³

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 to operate in conformance with the Federal Communications Commission’s (“Commission”) rules and any relevant coordination agreements.

In further support of this request, Intelsat incorporates by reference Exhibits A-D submitted with its original STA request,⁴ which contain technical information that demonstrates that the operation of the

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 Policy Branch Information, Actions Taken*, Report No. SES-02181, File No. SES-STA-20190705-00877 (July 10, 2019) (Public Notice).

³ See *Intelsat License LLC Modification of Riverside, California Earth Station, Call Sign E060384*, File No. SES-MFS-20190320-00332 (filed March 20, 2019).

⁴ See *Satellite Policy Branch Information, Actions Taken*, Report No. SES-02062, File No. SES-STA-20180504-00489 (May 16, 2018) (Public Notice).

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. To provide sufficient interference protection to U.S. Navy shipboard radiolocation operations, Intelsat will continue to operate based on the table provided below for uplink operation in band 13.75-14.00 GHz from Riverside, California. Using the below mentioned power levels, the earth station's signal flux density toward the shoreline will always be less than -167.0 dBW/m²/4KHz. Therefore, there should be no interference to the U.S. Navy radar systems.

<i>Arc</i>	<i>Power</i>
<i>45 to 190 W</i>	<i>76 dBW</i>
<i>45 to 185 W</i>	<i>82 dBW</i>
<i>45 to 180 W</i>	<i>86 dBW</i>
<i>45 to 175 W</i>	<i>88 dBW</i>

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.

The 24x7 contact information for Intelsat 5 TT&C operations 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 further STA extension request will allow Intelsat to continue to safely station-keep Intelsat 5 at the 137.0° W.L. orbital location and thereby promotes the public interest.

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

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Paul Blais