



INTELSAT.

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November 15, 2019

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

Re: Request for Special Temporary Authority
Napa, California Earth Station E190127

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests a grant of Special Temporary Authority (“STA”)¹ for 30 days, commencing December 3, 2019, to use its Napa, California C-band earth station (Call Sign E190127) to communicate with Galaxy 15 (Call Sign S2387)² for antenna verification testing prior to the antenna’s use with Galaxy 30 (Call Sign S3016).³

The proposed testing will be performed at 1575.42 MHz (downlink) and 6639.27 MHz (uplink) and is expected to occur over a 30-day period. Intelsat is also seeking a corresponding satellite STA for Galaxy 15.⁴

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 *Policy Branch Information; Actions Taken*, Report No. SAT-00233, File No. SAT-LOA-19991207-00119 (Aug. 13, 2004) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-01359, File No. SAT-LOA-20170524-00079 (Nov. 16, 2018) (Public Notice). Galaxy 30 is expected to launch in 2020.

⁴ See Intelsat License LLC Application for 30-day Grant of Special Temporary Authority to Operate Galaxy 15 at 1575.42 MHz and 6639.27 MHz, File No. SAT-STA-20191113-00130 (filed Nov. 13, 2019). Galaxy 15 is not currently licensed to operate in 1575.42 MHz or 6639.27 MHz. The satellite’s Wide Area Augmentation System (“WAAS”) payload, until recently, was licensed by Leidos Innovations Corporation (“Leidos”)—Leidos recently surrendered its license for the WAAS payload. See Letter from Jeffrey E. Rummel, Attorney for Leidos, Inc., Arent Fox, to Marlene H. Dortch, Secretary, Federal Communications Commission, Surrender of Space Station License Effective September 9, 2019 – S2372, File No. SAT-LOA-19990427-00047 (Sept. 4, 2019).

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In further support of this request, Intelsat herewith attaches Exhibit A, 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. 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 this testing is as follows:

Phone: (404) 589-3360 – Intelsat General Secure Operations Center

Request to speak with a shift supervisor.

Grant of this STA request will help ensure this antenna is operational prior to its use with Galaxy 30, which in turn will support customer service on Galaxy 30. As such grant is in the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Federal Communications Commission grant this STA 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