



**INTELSAT.**

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December 18, 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  
Paumalu, Hawaii Earth Station KA265

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 60 days of Special Temporary Authority (“STA”)<sup>1</sup> previously granted to Intelsat, to use its Paumalu, Hawaii C-band earth station (Call Sign KA265) to provide telemetry, tracking, and command (“TT&C”) services to Telstar 18 at its permanent location of 138.0° E.L.<sup>2</sup> Intelsat has filed an application for a permanent modification to its KA265 license to support Telstar 18 TT&C operations.<sup>3</sup>

The TT&C operations will continue to be performed using the following frequencies: 3630.0 MHz (V) in the downlink; and 5850.5 MHz and 6425.0 MHz (CP) in the uplink.

In further support of this request, Intelsat incorporates by reference Exhibit A of the original STA request,<sup>4</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

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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-02213, File No. SES-STA-20190702-00885 (Oct. 30, 2019) (Public Notice).

<sup>3</sup> See Intelsat License LLC’s Modification of Paumalu, Hawaii Earth Station, Call Sign KA265, File No. SES-MFS-20190424-00543 (filed April 24, 2019).

<sup>4</sup> See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02161, File No. SES-STA-20190419-00547 (May 15, 2019) (Public Notice).

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any lawfully operating terrestrial facility. In the unlikely event that harmful interference occurs, Intelsat will take all reasonable steps to eliminate the interference.

The 24x7 contact information for the Telstar 18 TT&C operations are 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 provide TT&C services to the Telstar 18 satellite at 138.0° E.L., which ensures safe station-keeping of the satellite. This, in turn, will help ensure the safety of the geostationary arc and thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Federal Communications 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