



February 20, 2020

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

Re: Request for Extension of Special Temporary Authority
Riverside, California Earth Station; Call Sign E020126

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60 days of Special Temporary Authority¹ ("STA") previously granted to Intelsat to use its Riverside, California Ku-band earth station (Call Sign E020126) to provide telemetry, tracking, and command ("TT&C") services for HISPASAT 143W-1² during the satellite's drift to, and on-station at 143° W.L.³ HISPASAT 143W-1 arrived at 143° W.L. on February 18, 2020. Intelsat will be seeking permanent authority for E020126 to provide TT&C services to HISPASAT 143W-1 at 143° W.L.

The HISPASAT 143W-1 TT&C operations will continue to be performed in the following center frequencies: 14498.7 MHz in the uplink and 12749.75 MHz in the downlink.

The 24x7 contact information for the HISPASAT 143W-1 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.

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.

² See *Policy Branch Information, Actions Taken*, Report No. SAT-01044, File No. SAT-PPL-20140717-00086 (Oct. 3, 2014) (Public Notice). HISPASAT 143W-1 was previously known as HISPASAT 30W-4 and HISPASAT-1D. Intelsat is seeking authorization to add HISPASAT 143W-1 to the Approved Space Station List. See *Satellite Policy Branch Information, Space Station Applications Accepted for Filing*, Report No. SAT-01439, File No. SAT-PDR-20191205-00143 (Jan. 17, 2020) (Public Notice).

³ See *Satellite Communications Services Information, Actions Taken*, Report No. 02233, File No. SES-STA-20191218-01756 (Jan. 15, 2020) (Public Notice).

In support of this request, Intelsat respectfully requests waivers of the U.S. Table of Frequency Allocations⁴ for the 12.7-12.75 GHz frequency band and, to the extent necessary, Section 25.137 of the Federal Communications Commission's rules regarding requests for U.S. market access through non-U.S.-licensed space stations⁵ for the reasons previously stated.⁶

In further support of this request, Intelsat incorporates by reference Exhibit A of its original request,⁷ 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 commercial 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.

Grant of this STA extension request will allow Intelsat to ensure the safe station-keeping of the HISPASAT 143W-1 satellite, and thereby promotes the public interest.

Please direct any questions regarding this STA extension 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

⁴ See 47 C.F.R. § 2.106.

⁵ 47 C.F.R. § 25.137.

⁶ See *supra* n. 3.

⁷ See *id.*