



March 20, 2020

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

**Re: Request for Further Extension of Special Temporary Authority
Riverside, California Earth Station E040125**

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) herein requests an additional 30 days of Special Temporary Authority (“STA”)¹ previously granted to Intelsat² to use its Riverside, California C-band earth station (Call Sign E040125) to provide launch and early orbit phase (“LEOP”) services for the GISAT-1 satellite. Due to unexpected delays, GISAT-1 is now expected to launch on April 1, 2020.³ Intelsat expects the LEOP period to last approximately eight days.⁴

The GISAT-1 LEOP operations will be performed at the following frequencies: 6423.208 MHz and 6425.980 MHz in the uplink, and 4199.145 MHz and 4199.582 MHz in the downlink. The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands 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 GISAT-1 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.

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.

² See, e.g., *Satellite Communications Services Information; Actions Taken*, Report No. SES-02247, File SES-STA-20200219-00174 (Mar. 4, 2020) (Public Notice).

³ The in-orbit testing and final location for GISAT-1, which Intelsat understands is licensed by India, will be 93.5° E.L.

⁴ Intelsat is requesting 30 days of STA to accommodate any further launch delays.

⁵ The Indian Space Research Organization (“ISRO”), the manager of the GISAT-1 mission, will handle the coordination.

Ms. Marlene H. Dortch
March 20, 2020
Page 2

In further support of this request, Intelsat incorporates by reference Exhibits A and B of its original request,⁶ which contain a coordination report and waiver requests. 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 GISAT-1 LEOP mission, ISRO will serve as the mission manager. ISRO 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 ISRO. 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 further STA extension request will allow Intelsat to help launch the GISAT-1 satellite. This will help provide services at the 93.5° E.L. location and thereby promotes the public interest.

Please direct any questions regarding this further 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

⁶ See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02230, File No. SES-STA-20191126-01589 (Jan. 8, 2020) (Public Notice).