August 21, 2020

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

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

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests an additional 30 days of Special Temporary Authority ("STA")[1] previously granted to Intelsat[2] to use its Riverside, California C-band earth station (Call Sign E040125) to provide launch and early orbit phase ("LEOP") services for the MEV-2 satellite (Call Sign S3059).[3] MEV-2 was launched on August 15, 2020, and the LEOP period is expected to last approximately six months.[4]

The MEV-2 LEOP operations will continue to be performed at the following frequencies: 5924.0 MHz, 5925.2 MHz, 6170.0 MHz, 6180.0 MHz, and 6424.0 MHz in the uplink; and 3701.0 MHz, 3944.5 MHz, 3955.5 MHz, and 4199.8 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 have been 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 MEV-2 LEOP mission is as follows:

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[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 Satellite Communications Services Information; Actions Taken*, Report No. SES-02289, File No. SES-STA-20200706-00712 (July 29, 2020) (Public Notice).

[3] *See Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01456, File No. SAT-LOA-20191210-00144 (Mar. 27, 2020) (Public Notice). The final location for MEV-2 will be 1.0° W.L.

[4] Intelsat is separately requesting 180 days of STA to support the extended orbit-raising time period required by a satellite using electric orbit raising. *See* Intelsat's Request for 180−day grant of Special Temporary Authority to use Riverside, California earth station (E040125) to provide LEOP for MEV-2, File No. SES-STA-20200706-00718 (filed July 3, 2020).

[5] Northrop Grumman Space Systems ("NGSS"), the manager of the MEV-2 mission, will handle the coordination.

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.

In further support of this request, Intelsat incorporates by reference Exhibit A of its original request,[6] which contains a coordination report. 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 MEV-2 LEOP mission, NGSS is serving as the mission manager. NGSS builds and send the commands to the Intelsat antenna, which processes and executes the commands. Telemetry received by Intelsat is forwarded to NGSS. Intelsat performs the ranging sessions by sending a tone to the spacecraft periodically. Intelsat remains in control of the baseband unit, RF equipment, and antenna.

Grant of this STA extension request will allow Intelsat to help ensure continuity of service at 1.0° W.L. Once on-orbit, MEV-2 will dock with Intelsat 10-02 and, as a combined vehicle stack, the satellites will continue to provide service long past Intelsat 10-02's original lifespan. Grant of this request will thereby promote 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

[6] *See supra* n. 2.