

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

Hagerstown, Maryland Earth Station KA258

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests an additional 30 days of Special Temporary Authority ("STA")<sup>1</sup> previously granted to Intelsat<sup>2</sup> to use its Hagerstown, Maryland Ku-band earth station (Call Sign KA258) to provide launch and early orbit phase ("LEOP") services for the BSAT-4b satellite.<sup>3</sup> BSAT-4b was launched on August 15, 2020, and Intelsat expects the LEOP period to last approximately 30 days.

The BSAT-4b LEOP operations will continue to be performed at the following frequencies: 17300.8 MHz, 17303.6 MHz, and 17305.0 MHz in the uplink; and 11704.3 MHz, 11705.7 MHz, and 11708.5 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.<sup>4</sup> 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 BSAT-4b 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.

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> See Satellite Communications Services Information; Actions Taken, Report No. SES-02289, File No. SES-STA-20200706-00715 (July 29, 2020) (Public Notice).

<sup>&</sup>lt;sup>3</sup> The final location for BSAT-4b, which Intelsat understands is licensed by Japan, will be 110.0° E.L.

<sup>&</sup>lt;sup>4</sup> Maxar, the manager of the BSAT-4b mission, will handle the coordination.

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In further support of this request, Intelsat incorporates by reference Exhibit A of its original request,<sup>5</sup> which contains 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 BSAT-4b LEOP mission, Maxar will serve as the mission manager. Maxar 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 Maxar. Maxar 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 STA extension request will allow Intelsat to help launch the BSAT-4b satellite, which will serve as a backup for BSAT-4a. 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

<sup>5</sup> See id.