January 14, 2021

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Request for Special Temporary Authority
Brewster, Washington Earth Station E202208

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests a grant of Special Temporary Authority ("STA")[1] for 60 days, commencing January 25, 2021, to use its Brewster, Washington C-band earth station (Call Sign E202208) to communicate with Galaxy 3C (S2381), Galaxy 12 (S2422), Galaxy 13 (S2386), Galaxy 14 (S2385), Galaxy 15 (S2387), Galaxy 16 (S2687), Galaxy 17 (S2715), Galaxy 18 (S2733), Galaxy 19 (S2647), Galaxy 23 (S2592), Galaxy 25 (S2154), Galaxy 28 (S2160), Galaxy 30 (S3016), Horizons 1 (S2475), Intelsat 18 (S2817), Intelsat 23 (S2831), and Intelsat 34 (S2915) satellites, for antenna verification testing prior to the antennas' use. Intelsat has a pending license application for permanent operations of this earth station.[2]

The proposed testing will be performed at 3625-4200 MHz (downlink) and 5850-6425 MHz (uplink). The proposed operations will be consistent with Intelsat's relevant coordination agreements.

The 24x7 contact information for the proposed testing is:

Phone: +1 509-689-1000

Request to speak with Darryl White

In further support of this request, Intelsat incorporates by reference the technical information provided in its license application.[3] This technical information demonstrates that operation of the earth station will be compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating terrestrial facility. In the extremely unlikely event that

[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* Intelsat Licensee LLC, as debtor in possession, Request for a New Earth Station located in Brewster, Washington, IBFS File No. SES-LIC-20201222-01428 (filed Dec. 21, 2020).

[3] *Id*.

harmful interference should occur due to transmissions to or from its earth station, Intelsat will take all reasonable steps to eliminate the interference.

In February 2020, the Federal Communications Commission ("Commission") adopted the *C-Band Order*, which requires all incumbent C-band satellite operators to consolidate their telemetry, tracking, and command ("TT&C") operations within CONUS into four protected locations prior to December 5, 2021.[4] Consistent with the *C-Band Order*, Intelsat has submitted two earth station applications[5] for its new C-band antennas in Brewster,[6] which is one of the *C-band Order* protected locations. Grant of this STA request will allow Intelsat to ensure E202208 is available for service, which in turn will help support the successful and timely consolidation of Intelsat's C-band TT&C operations. Grant of this request thereby promotes the public interest.

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request.

Please direct any questions regarding this STA request to the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady
Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Paul Blais

[4] *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 85 Fed. Reg. 22804, ¶ 375 (Apr. 23, 2020) ("*C-band Order*"); 47 C.F.R. § 25.203(n) (restricting interference protection for TT&C operations in the 3.7-4.0 GHz band to four locations).

[5] *See supra* n. 2; Intelsat Licensee LLC, as debtor in possession, Request for a New Earth Station located in Brewster, Washington, IBFS File No. SES-LIC-20201222-01430 (filed Dec. 21, 2020).

[6] Intelsat will also be seeking to license a second set of C-band antennas in Andover, ME. Together, these two teleports—Brewster, WA and Andover, ME—will enable Intelsat to efficiently consolidate its C-band TT&C operations at two protected teleports within the contiguous United States.