



July 12, 2021

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

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

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests a grant of Special Temporary Authority ("STA")¹ for 30 days, commencing July 29, 2021, to use its Riverside, California C-band earth station, Call Sign E040125, to provide launch and early orbit phase ("LEOP") services and telemetry, tracking, and command ("TT&C") services during in-orbit testing ("IOT") for the Star One D2 satellite. Star One D2 is expected to launch on July 29, 2021.² Intelsat expects the LEOP and IOT period to last approximately 22 days.

The Star One D2 operations will be performed at the following frequencies: 6418.5 MHz and 6424.5 MHz in the uplink; and 4196.5 MHz and 4197.7 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.³ 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 Star One D2 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.

In further support of this request, Intelsat herewith attaches Exhibits A and B, which contain waiver requests and a coordination report. In the extremely unlikely event

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 Intelsat understands that Star One D2 is licensed by Brazil. The IOT of Star One D2 will occur at both 69° E.L. and 70° E.L., and the satellite's final location will be 70° E.L.

³ Maxar, the manager of the Star One D2 mission, will handle the coordination.

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 Star One D2 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. 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 STA request will allow Intelsat to help launch the Star One D2 satellite. This will help provide services at the 70° E.L. location and thereby promotes the public interest.

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