



August 12, 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 September 8, 2021, to use its Brewster, Washington C-band earth station, Call Sign E202208, to communicate with various Intelsat satellites in order to provide telemetry, tracking, and command (“TT&C”) and customer services in the 3.6-4.2 GHz, 5.85-6.425 GHz, and 6.715-6.725 GHz frequencies (“C-band”). Intelsat has a pending license application for permanent operations of this earth station.²

The proposed operations will be performed at 3.6-4.2 GHz (downlink) and 5.85-6.425 GHz and 6.715-6.725 GHz (uplink) with the following satellites:

Galaxy 3C (S2381)	Galaxy 17 (S2715)	Galaxy 30 (S3016)
Galaxy 12 (S2422)	Galaxy 18 (S2733)	Intelsat 18 (S2817)
Galaxy 13 (S2386)	Galaxy 19 (S2647)	Intelsat 23 (S2831)
Galaxy 15 (S2387)	Galaxy 23 (S2592)	Intelsat 34 (S2915)
Galaxy 16 (S2687)	Galaxy 28 (S2160)	

The proposed operations will be consistent with Intelsat’s relevant coordination agreements.

The 24x7 contact information for the operations is:

Phone: +1 509-689-1000

Request to speak with Darryl White

In further support of this request, Intelsat herewith attaches Exhibits A and B, which contain radiation hazard and frequency coordination reports. This technical information demonstrates 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).

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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 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 operations within CONUS into four protected locations prior to December 5, 2021.³ Consistent with the *C-Band Order*, Intelsat has submitted two earth station applications for its new C-band antennas in Brewster,⁴ which is one of the *C-band Order* protected locations. Grant of this STA request will allow Intelsat to ensure the successful and timely consolidation of Intelsat’s C-band TT&C operations and 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
Kerry Murray

³ *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). See also Intelsat License LLC Petition for Reconsideration, GN Docket No. 18-122 (May 26, 2020) (seeking reconsideration of the December 5, 2021 date for consolidation of TT&C sites and other matters).

⁴ See *supra* n. 2; Intelsat Licensee LLC, as debtor in possession, Application for a new earth station in Brewster, Washington, IBFS File No. SES-LIC-20201222-01430 (filed Dec. 21, 2020).