



November 3, 2021

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

Re: Request for Extension of Special Temporary Authority
Brewster, Washington Earth Station E202210

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests an additional 60 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat² to use its Brewster, Washington C-band earth station, Call Sign E202210, to communicate with various Intelsat satellites in order to provide telemetry, tracking, and command ("TT&C") and customer services in the 3.7-4.2 GHz and 5.925-6.425 GHz frequencies ("C-band"). Intelsat has a pending license application for permanent operations of this earth station.³

The proposed operations will continue to be performed at 3.7-4.2 GHz (downlink) and 5.925-6.425 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 continue to be consistent with Intelsat's relevant coordination agreements.

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 *Satellite Communications Services Information, Actions Taken*, Report No. SES-02398, File No. SES-STA-20210812-01493 (Sept. 8, 2021) (Public Notice).

³ See *Satellite Communications Services; Satellite Radio Applications Accepted for Filing*; Report No. SES-02391, File No. SES-LIC-20201222-01430 (Aug. 18, 2021) (Public Notice).

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 incorporates by reference Exhibits A and B of its original request,⁴ which contain radiation hazard and frequency coordination reports. 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 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, 2021.⁵ Consistent with the *C-Band Order*, Intelsat has submitted two earth station applications for its new C-band antennas in Brewster,⁶ which is one of the *C-band Order* protected locations. Grant of this STA extension 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 extension request.

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
Assistant General Counsel, Intelsat US LLC
on behalf of Intelsat License LLC
7900 Tysons One Place
McLean, VA 22102

cc: Kerry Murray

⁴ See *supra*, n. 2.

⁵ *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).

⁶ See *supra*, n. 3.