



December 18, 2021

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

Re: Request for Special Temporary Authority
Andover, Maine Earth Station AND-C33

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 January 15, 2022, to use its Andover, Maine 13.1m C-band earth station, AND-C33, to communicate with the Intelsat 35e (S2959) satellite for antenna verification testing prior to the antenna's use. Intelsat will be filing for authority to operate this antenna on a permanent basis.

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 technical specifications for the 13.1m antenna uplink operations are:

Frequencies:	5850-6425 MHz	5850-6425 MHz	5850- 5860 MHz; 5925-5935 MHz; 6170-6180 MHz; 6415-6425 MHz	5850- 5860 MHz; 5925-5935 MHz; 6170-6180 MHz; 6415-6425 MHz
Polarization:	linear and circular			
Emission Designators:	64K0G7W	72M0G7W	1M00F2D, 1M00F7D, 1M00F9D	1M50F2D 1M50F7D 1M50F9D
Gain:	56.6 dB @ 6.250 GHz			
EIRP Value:	51.34 dBW	81.85 dBW	78.57 dBW	80.34 dBW
Input Power:	955 W			

¹ Intelsat has filed its STA request, an FCC Form 159, a \$195.00 filing fee, and this supporting letter electronically via the International Bureau's Filing System.

The 24x7 contact information for the proposed testing is:

Phone: +1 404-381-2839

Request to speak with Mark Ratcliff

In further support of this request, Intelsat herewith attaches Exhibits A and B, which contain coordination and radiation hazard reports. 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 ("TT&C") operations within CONUS into four protected locations prior to December 5, 2021.² Consistent with the *C-Band Order*, Intelsat is submitting this request as part of the buildout for its Andover, Maine teleport, which is one of the *C-band Order* protected locations. Grant of this STA request will allow Intelsat to ensure its C-band antenna 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

on behalf of Intelsat License, LLC

cc: Kerry Murray

² *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).