



February 9, 2022

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

Re: Request for Extension of Special Temporary Authority
Andover, Maine Earth Station, Call Sign E220005 (AND-C33)

Dear Ms. Dortch:

Intelsat License LLC, as debtor in possession ("Intelsat"), herein requests an additional 30 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat² to use its Andover, Maine 13.1m C-band earth station, Call Sign E220005, to communicate with the Intelsat 35e satellite (Call Sign S2959) for antenna verification testing prior to the antenna's use. Intelsat has filed for authority to operate this antenna on a permanent basis.³

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

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-02440, File No. SES-STA-20211221-01966 (Feb. 9, 2022) (Public Notice). The initial STA referred to this earth station as AND-C33. The Call Sign E220005 has since been assigned to AND-C33. Due to weather conditions, testing has been delayed and is expected to begin in mid-February.

³ See Intelsat License LLC, as debtor in possession, Application for new earth station in Andover, Maine AND-C33, File No. SES-LIC-20220118-00059 (filed Jan. 14, 2022).

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			

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 incorporates by reference Exhibits A and B of its original request,⁴ 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, 2021.⁵ 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 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

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).