



May 16, 2022

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 ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing June 22, 2022, to use its Riverside, California C-band earth station, Call Sign E040125, to provide launch and early orbit phase ("LEOP") services for the Measat-3D satellite.² Measat-3D is expected to launch on June 22, 2022.³ Intelsat expects the LEOP period to last approximately 10 days.⁴

The Measat-3D operations will be performed at the following frequencies: 6420.0 MHz and 6424.0 MHz in the uplink; and 4191.0 MHz and 4196.0 MHz in the downlink.⁵

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 In support of this request, additional antenna and satellite information is provided in Exhibit A, a waiver request in Exhibit B, and a coordination report is attached as Exhibit C.

³ Intelsat understands that Measat-3D is licensed by Malaysia. The satellite's in-orbit testing and final location will be 91.5° E.L.

⁴ Intelsat is requesting 30 days of STA to accommodate launch delays.

⁵ Though STAs are outside of the scope of the temporary freeze on applications for new or modified earth stations in the 3700-4200 MHz band (C-band), out of an abundance of caution and to the extent necessary, Intelsat seeks waiver of the temporary freeze in order to provide LEOP services on a non-protected, non-interference basis for approximately ten days. See *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Station and Fixed Microwave Stations in the 3.7-4.2 GHz Band*; 90-day Window to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band, Public Notice, GN Docket Nos. 17-183, 18-122, DA 18-398 (Apr. 19, 2018) ("*C-band Freeze*"). The Commission may grant a waiver for good cause shown, and is appropriate where the particular facts make strict compliance inconsistent with the public interest. 47 C.F.R. § 1.3, *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990). Good cause exists to waive the *C-band Freeze* because grant of this STA will serve the public interest by ensuring the safe LEOP of Measat-3D, which will in turn provide service from

The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁶ All operators of satellites in the LEOP path will be provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs. 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.

The 24x7 contact information for the Measat-3D 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 Kevin Bell or Glen Jones.

Finally, Intelsat clarifies that during the Measat-3D mission, Airbus will serve as the mission manager. Airbus 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 Airbus. 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 Measat-3D satellite. This will help provide services at the 91.5° 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: Kerry Murray

91.5° E.L. (where it will not see the U.S.), and (2) the grant will not undermine the objective of the freeze—to preserve the current landscape of authorized operations in the 3.7-4.2 GHz band during the Federal Communications Commission's ongoing inquiry into the band—because the requested operations, if granted, will be on a non-protected basis for a short period of time (10 days), thereby causing no impact on the current C-band landscape. See *C-band Freeze* at 1, 3.

⁶ Airbus, the manager of the Measat-3D mission, will handle the coordination.

EXHIBIT A

Antenna

Antenna size	11.0m
Transmit Frequencies	6420.0 MHz 6424.0 MHz
Receive Frequencies	4191.0 MHz 4196.0 MHz
Emission Designator	1M00F2D
Polarization	Circular
Bandwidth	1 MHz
Transmit Gain	54.8 dBi at 6.423208 GHz
Maximum EIRP per Carrier	85 dBW/1 MHz
Maximum EIRP Density per Carrier	61 dBW/4 KHz
Site Location	Riverside, CA
Latitude (NAD83)	33° 47' 43.4" N
Longitude (NAD83)	117° 5' 21.1" W

Point(s) of Communication

Satellite	Measat-3D
Call Sign	none
Satellite Type	Geostationary
Orbital Location	91.5° E.L.