



June 14, 2022

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 E220059

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing July 15, 2022, to use its Andover, Maine C-band earth station, Call Sign E220059, to perform antenna verification testing in extended C-band frequencies. The antenna will communicate with Intelsat 901 (S2405), Intelsat 25 (S2804), and Intelsat 30 (S2887) in order to verify the antenna performance.²

The proposed testing will be performed at 3625-3700 MHz (downlink) and 6715-6725 MHz (uplink).³ The proposed operations will be consistent with Intelsat's relevant satellite coordination agreements.⁴

The 24x7 contact information for the proposed testing is: Mark Ratcliff at +1 404-381-2839.

In support of this request, Intelsat herewith attaches Exhibits A, B, and C, which contain additional antenna information, a coordination report, and a radiation hazard report, respectively. Operation of the earth station will be compatible with its electromagnetic environment and will not cause

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 Intelsat has a pending application for authorization for this antenna on a permanent basis, as expressly authorized by C-band Order. See Intelsat License LLC, Application for new earth station in Andover, Maine AND-C39, File No. SES-LIC-20220511-00474 (filed May 11, 2022); *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"). Intelsat also has a pending STA request to test standard C-band frequencies, see Intelsat License LLC, Request for Special Temporary Authority, File No. SES-STA-20220610-00639 (filed June 9, 2022).

³ To the extent necessary, Intelsat seeks waiver of US245 limiting non-Federal fixed-satellite service in 3600-3650 MHz to international inter-continental systems for the limited purpose of testing on a non-interference, non-protected basis.

⁴ Intelsat will also be seeking satellite STAs to support verifying the performance of E220059.

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 location.⁵ Consistent with this Order, Intelsat submits this request as part of the buildout for its Andover, Maine teleport, which is one of the identified consolidated, protected teleports.⁶ Grant of this STA request will allow Intelsat to ensure its C-band antenna is available for service, which will further the Commission’s objectives in the *C-band Order* by helping to ensure 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) 559-7799.

Respectfully submitted,

/s/ Cynthia J. Grady
Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Kerry Murray

⁵ *C-band Order* at, ¶ 375.

⁶ See Letter from Michelle V. Bryan, Executive Vice President, General Counsel and Chief Administrative Officer, Intelsat US LLC, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 18-122 and 20-173, at 20-25 (Aug. 14, 2020).

EXHIBIT A

Antenna

Antenna size	13.2m
Transmit Frequencies	6715-6725 MHz
Receive Frequencies	3625-3700 MHz
Emission Designators	1M00F7D-1M50F7D
Polarization	Linear and Circular
Bandwidth	72 MHz
Transmit Gain	56.6 dB @ 6.250 GHz
Maximum EIRP per Carrier	86.0 dBW/1 MHz
Maximum EIRP Density per Carrier	62.4 dBW/4 KHz
Site Location	Andover, ME
Location	70° 41' 58.9" W
	44° 37' 56.3" N

Point(s) of Communication

Satellite	Intelsat 901	Intelsat 25	Intelsat 30
Call Sign	S2405	S2804	S2887
Satellite Type	Geostationary	Geostationary	Geostationary
Orbital Location	27.5° W.L.	31.5° W.L.	95.05° W.L.