



July 28, 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 E220058

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 60 days of Special Temporary Authority ("STA"),¹ previously granted to Intelsat² to use its Andover, Maine C-band earth station, Call Sign E220058, to perform antenna verification testing. The antenna is communicating with Intelsat 23 (S2831), Intelsat 34 (S2915), and Intelsat 901 (S2405) in order to verify the antenna performance in advance of commercial operations.³

The testing is being performed at 3700-4200 MHz (downlink) and 5850-6425 MHz (uplink). The operations are consistent with Intelsat's relevant coordination agreements.

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

In support of this request, Intelsat incorporates by reference attaches Exhibits A-C, which contain additional antenna information, a coordination report, and a radiation hazard report, respectively.⁴ 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, In

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-02482, File No. SES-STA-20220518-00576 (July 13, 2022) (Public Notice).

³ 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-C38, File No. SES-LIC-20220511-00473 (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").

⁴ See *supra*, n. 2.

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.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 extension request will allow Intelsat to ensure its C-band antenna is available for service, which will further of 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.⁷ 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) 559-7799.

Respectfully submitted,

/s/ W. Ray Rutngamlug

W. Ray Rutngamlug
Associate 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).

⁷ Prior to adopting the *C-band Order*, the Commission issued a Public Notice temporarily freezing applications for new or modified earth station in the 3700-4200 MHz band. 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*”). Intelsat believes that STAs are outside of the scope of *C-band Freeze*, but out of an abundance of caution and to the extent necessary, Intelsat seeks waiver of the temporary freeze in order to perform antenna verification testing of this antenna located at its protected Andover, Maine teleport. 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). As outlined above, good cause exists to waive the *C-band Freeze* in the instant case.