



August 17, 2022

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

Re: Request for Extension of Special Temporary Authority to Test E220058 in
Extended C-band; Andover, Maine Earth Station E220058

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 30 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 in extended C-band.³ The antenna will continue to communicate with Intelsat 901 (S2405), Intelsat 25 (S2804), and Intelsat 30 (S2887) to verify the antenna's performance.⁴

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

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

In support of this request, Intelsat incorporates by reference Exhibits A, B, and C of its original request,⁵ which contain additional antenna information, a coordination report, and a radiation hazard report, respectively. Operation of the earth station is and will continue to be compatible

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-02486, File No. SES-STA-20220621-00666 (July 27, 2022) (Public Notice). Additionally, Intelsat requests that waiver of footnote US245 of the U.S. Table of Allocations be extended for the reasons previously stated. See *id.*, grant condition 3.

³ Intelsat has a pending application for authorization to operate this antenna on a permanent basis in the 3700-4200 MHz and 5850-6425 MHz frequency bands, see *Satellite Communications Services; Satellite Radio Applications Accepted for Filing*, File No. SES-LIC-20220511-00473 (June 22, 2022) (Public Notice).

⁴ See, e.g., Intelsat's Request for Extension of Special Temporary Authority to Operate Intelsat 25 at 31.5° W.L. in Extended C-band Frequencies with U.S. Earth Stations, File No. SAT-STA-20220816-00084 (filed Aug. 16, 2022). Intelsat will continue to extend the satellite STAs in parallel with its earth station STAs.

⁵ See *supra*, n.2.

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 location.⁶ 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.⁷ Grant of this STA extension 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 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

cc: Kerry Murray
Franco Hinojosa

⁶ See *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) at ¶ 375.

⁷ See Letter from Michelle V. Bryan, Executive Vice President, General Counsel and Chief Administrative Officer, Intelsat US LLC on behalf of Intelsat License LLC, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 18-122 and 20-173, at 20-25 (Aug. 14, 2020).