



August 24, 2022

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

Re: Request for Extension of Special Temporary Authority
7.3m S-band Antenna, Haleiwa, Hawaii

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests an additional 180 days of Special Temporary Authority ("STA")¹ previously granted to Intelsat² to utilize a 7.3m S-band antenna located at its Haleiwa, Hawaii teleport to provide telemetry, tracking, and command ("TT&C") restoration services ("TT&C Restoration Services") for the EUTELSAT-139W (S3055)³ satellite at 139.2° W.L. The TT&C Restoration Services include bi-annual testing, which lasts approximately two hours per test, and TT&C services in the event the satellite's primary TT&C experiences an anomaly.

The TT&C Restoration Services will continue to be performed at the following frequencies: 2086.03 MHz in the uplink and 2265.38 MHz in the downlink.

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 TT&C Restoration Services 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.

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-02448, File No. SES-STA-20210215-00344 (Mar. 9, 2022) (Public Notice).

³ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01458, File No. SAT-PDR-20191017-00115 (Apr. 10, 2020) (Public Notice); *Eutelsat SA's Petition for Declaratory Ruling to Modify the U.S. Market Access Grant for EUTELSAT 139 West A*, File No. SAT-PPL-20210209-00019 (filed Feb. 9, 2021) (seeking market access for additional frequency bands and beams at 139.2° W.L.).

In support of this request, Intelsat incorporates by reference Exhibit A of its original request,⁴ which contains technical information that demonstrates that the operation of the earth station is compatible with its electromagnetic environment and will not cause harmful interference into any lawfully operating commercial terrestrial facility.

Additionally, Intelsat requests continued waiver of the U.S. Table of Frequency Allocations ("Table of Allocations") for the use of 2025-2100 MHz and 2200-2290 MHz for the reasons previously set forth.⁵

Finally, Intelsat understands and accepts that grant of this STA extension request will be conditioned as follows:

- Any future requests or extensions will need to be submitted to the FCC to be re-coordinated with the National Telecommunications and Information Administration (NTIA).
- Uplink operations from the Haleiwa, Hawaii ground station to EUTELSAT-139W shall not occur when the National Aeronautics and Space Administration's ("NASA") International Space Station (ISS) (NORAD designation 25544 or international spacecraft ID 1998-067A) is within 15 degrees of the Haleiwa, Hawaii ground station antenna boresight.
- Operations using 2086.03 MHz or 2265.38 MHz shall be pre-coordinated with the NASA Goddard Space Flight Center (GSFC) Spectrum Manager at least 7 days prior to operation.
- Due to potential harmful interference to naval activities, Intelsat's radio frequency operations plan shall be submitted as soon as possible to the Naval Surface Warfare Center, Dahlgren Division (NSWCDD).

Grant of this STA extension request will allow Intelsat to continue to provide TT&C Restoration Services to the EUTELSAT-139W spacecraft, which will in turn ensure safe station-keeping of the satellite and thereby promotes the public interest.

Please direct any questions regarding this STA extension request to the undersigned at (703) 559-6949.

Sincerely,

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

cc: Franco Hinojosa
Kerry Murray

⁴ See *supra*, n. 2.

⁵ *Id.*