

August 30, 2022

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

Re: Request for 180-day Grant of Special Temporary Authority
Hagerstown, Maryland Earth Station KA258

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 180 days of Special Temporary Authority ("STA"),¹ commencing November 11, 2022, to use its Hagerstown, Maryland Ku-band earth station, Call Sign KA258, to provide launch and early orbit phase ("LEOP") services to the Eutelsat-E10B satellite.² Eutelsat-E10B is expected to launch on November 11, 2022.³ Intelsat expects the LEOP to last approximately six months.

The Eutelsat-E10B operations will be performed at the following frequencies: 14000.0 MHz and 14499.8 MHz in the uplink; and 11701.6 MHz and 11704.0 MHz in the downlink.

The LEOP operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP path.⁴ All operators of satellites in that 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 Eutelsat-E10B 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.

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 operational information is provided in Exhibit A and a waiver request is provided in Exhibit B.

³ Intelsat understands that Eutelsat-E10B is licensed by France; the in-orbit testing will occur at 1.5° E.L. and the final location will be 10° E.L.

⁴ Thales Alenia Space ("Thales"), the manager of the Eutelsat-E10B mission, will handle the coordination.

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Finally, Intelsat clarifies that during the Eutelsat-E10B LEOP mission, Thales will serve as the mission manager. Thales 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 Thales. 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 Eutelsat-E10B satellite. This will help provide services at the 10° E.L. orbital 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: Franco Hinojosa
Kerry Murray

EXHIBIT A

Intelsat's Request for STA to provide LEOP for Eutelsat-E10B

Earth Station Call Sign	KA258
Antenna size (m)	14.2
Transmit Frequencies (MHz)	14000.0, 14000.8
Receive Frequencies (MHz)	11701.6, 11704.0
Emission Designator	500KG2D
Polarization	Circular
Bandwidth	500 KHz
Transmit Gain	64.5 dBi at 13.750 GHz
Maximum EIRP per Carrier (dBW)	80
Maximum EIRP Density per Carrier (dBW/4 kHz)	59.3
Site Location	Hagerstown, MD
Latitude/Longitude (NAD83)	39° 35' 54" N, 77° 45' 33" W
Satellite Point(s) of Communication	Eutelsat-E10B
Satellite Call Sign	n/a, see Exhibit B
Satellite Type	Geostationary
Satellite Location	n/a