

September 19, 2022

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

Re: Request for Special Temporary Authority
Fillmore, California Earth Station KA391

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing October 20, 2022, to use its Fillmore, California C-band earth station, Call Sign KA391,² to provide telemetry, tracking, and command ("TT&C") services during in-orbit testing ("IOT") of Galaxy 31 (S3076) at 148.95 °W.L.,³ Galaxy 32 (S3078) at 149.05°W.L.,⁴ Galaxy 34 (S3083) at 147.95° W.L.,⁵ Galaxy 35 (S3143) at 150.05° W.L.,⁶ and Galaxy 36 (S3148)⁷ at 149.95° W.L. (the "Galaxy Fleet"). The Galaxy Fleet is expected to launch between October 2022 and December 2022, with IOT occurring shortly after the launch and early orbit phase ("LEOP") is complete.⁸ TT&C services to the Galaxy Fleet IOT will occur beginning on October 20, 2022 and are expected to be complete by January 2023.

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 antenna and satellite information, a waiver request, and a coordination report are attached as Exhibits A-C, respectively.

³ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01562, File No. SAT-RPL-20201109-00130 (June 25, 2021) (Public Notice).

⁴ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01615, File No. SAT-LOA-20210107-00004 (March 4, 2022) (Public Notice).

⁵ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01587, File No. SAT-RPL-20210325-00039 (Oct. 22, 2021) (Public Notice).

⁶ See Intelsat License LLC, Application for Authority to Launch and Operate Galaxy 35, a Replacement Satellite, at 95.15° W.L., File No. SAT-RPL-20220414-00041 (filed Apr. 14, 2022).

⁷ See Intelsat License LLC, Application for Authority to Launch and Operate Galaxy 36, a Replacement Satellite with New Frequencies, at 89° W.L., File No. SAT-LOA-20220607-00058 (filed June 7, 2022).

⁸ Galaxy 34 is expected to launch early October; Galaxy 31 and Galaxy 32 are expected to launch in early November; and Galaxy 35 and Galaxy 36 are expected to launch in mid-December.

IOT of the Galaxy Fleet will be performed at the following frequencies: 6415.0 MHz-6424.0 MHz in the uplink; and 4000.0 MHz-4200.0 MHz in the downlink.

The 24x7 contact information for the 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.

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 relocate their operations out of the lower C-band frequencies below 4.0 GHz and into the upper C-band frequencies of 4.0-4.2 GHz.⁹ The Galaxy Fleet will provide additional upper C-band capacity in furtherance of the Commission’s goal of clearing 3.7-4.0 GHz. Grant of this STA request will ensure the satellites are operating consistent with their authorizations and are capable of using their assigned frequencies. Grant of this request will thereby promote 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

⁹ 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, ¶¶ 149-151 (Apr. 23, 2020) (“*C-band Order*”).

EXHIBIT A

Intelsat's Request for STA to provide LEOP for the Galaxy Fleet

Earth Station Call Sign	KA391
Antenna Size (m)	12
Transmit Frequencies (MHz)	6415.0 MHz – 6424.0
Receive Frequencies (MHz)	4000.0 MHz – 4200.0
Emission Designator	1M00F2D
Polarization	Circular
Bandwidth	1 MHz
Transmit Gain	55.6 dBi @ 6.175 GHz
Maximum EIRP per Carrier (dBW)	82.6
Maximum EIRP Density per Carrier (dBW/4 kHz)	58.6
Site Location	Fillmore, CA
Latitude/Longitude (NAD83)	34° 24' 19.0" N, 118° 53' 36.0" W
Satellite Point(s) of Communication (Call Sign) and Satellite IOT Location	Galaxy 31 (S3076) 148.95 °W.L.
	Galaxy 32 (S3078) 149.05°W.L.
	Galaxy 34 (S3083) 147.95° W.L.
	Galaxy 35 (S3143) 150.05° W.L.
	Galaxy 36 (S3148) 149.95° W.L.
Satellite Type	Geostationary