



September 14, 2022

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

Re: Request for Special Temporary Authority
Andover, Maine Earth Station E220002

Re: Request for Special Temporary Authority
Andover, Maine Earth Station E220003

Re: Request for Special Temporary Authority
Andover, Maine Earth Station E220004

Re: Request for Special Temporary Authority
Andover, Maine Earth Station E220005

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 60 days of Special Temporary Authority ("STA"),¹ commencing October 17, 2022, to use its Andover, Maine C-band earth stations, Call Signs E220002, E220003, E220004, and E220005² to communicate with Intelsat 25 (S2804), Intelsat 35e (S2959), Intelsat 37e (S2972), and Intelsat 901 (S2405) in order to provide telemetry, tracking, and command ("TT&C") and customer services in the 3625-4200 MHz and 5850-6425 MHz frequencies ("C-band"). Intelsat has pending license applications for permanent operations of these earth stations.

The proposed operations will be performed at 3625-4200 MHz (downlink) and 5850-6425 MHz (uplink) and will be consistent with Intelsat's relevant coordination agreements.

The 24x7 contact information for the operations is:

Phone: +1 404-381-2839
Request to speak with Mark Ratcliff

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 Intelsat License LLC, as debtor-in possession, Applications for new earth stations in Andover, Maine AND-C30, AND-C31, AND-C32, and AND-C33, File Nos. SES-LIC-20220118-00054, SES-LIC-20220118-00057, SES-LIC-20220118-00058, and SES-LIC-20220118-00059 (filed Jan. 15, 2022).

In further support of this request, Intelsat incorporates by reference the technical information provided in the permanent applications.³ This technical information demonstrates that 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, tracking, and command operations within CONUS into four protected locations.⁴ 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.⁵ Grant of this STA request would promote the public interest by allowing Intelsat to ensure its C-band antennas are 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.⁶

For the reasons set forth herein, Intelsat respectfully requests that the Commission grant this STA request. 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

³ *Id.*

⁴ 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*”) at ¶ 375.

⁵ 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).

⁶ 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.