



September 19, 2022

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

Re: Request for Extension of Special Temporary Authority
Nuevo, California Earth Station E040125

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 Nuevo, California C-band earth station, Call Sign E040125, to communicate with Galaxy 15 (S2387) at power levels higher than authorized by the current license pursuant to a waiver of Section 25.115(a)(6)(i) of the Federal Communications Commission's ("Commission") rules.³

Galaxy 15 recently experienced an anomaly which resulted in the loss of commanding.⁴ Intelsat is utilizing E040125 as it diligently works to regain satellite commanding on Galaxy 15; as part of this effort, Intelsat requires the use of the antenna at a power higher than the maximum licensed power. The operations will be performed in the following uplink frequencies: 6025.0 MHz, 6165.0 MHz, and 6420.5 MHz in the uplink.

The 24x7 contact information for the proposed operations is: Intelsat's Network Operations Center at +1 404-381-2900. Ask to speak to a supervisor.

The continued operations will be coordinated with all potentially affected satellite operators. All potentially affected satellite operators have been provided with an emergency phone number where the licensee can be reached in the event that harmful interference occurs. In the 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.

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 See *Satellite Communications Services Information; Actions Taken*, Report No. SES-02494, File No. SES-STA-20220819-00890 (Aug. 24, 2022) (Public Notice). Intelsat incorporates by reference Exhibit A of this request, which contains additional operational information.

³ 47 C.F.R. § 25.115(a)(6)(i).

⁴ See, e.g., Intelsat License LLC, Request for Special Temporary Authority for Galaxy 15, IBFS File No. SAT-STA-20220818-00087 (filed Aug. 18, 2022). The satellite is currently drifting eastward.

Grant of this STA extension request is in the public interest. The Commission may grant a waiver for good cause shown.⁵ The Commission typically grants a waiver where the particular facts make strict compliance inconsistent with the public interest.⁶ In granting a waiver, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.⁷ Waiver is therefore appropriate if special circumstances warrant a deviation from the general rule, and such a deviation will serve the public interest.

Good cause exists in this case based on hardship. Due to a sudden loss of commanding, Galaxy 15 began drifting eastward outside of its station-keeping box on August 18, 2022. As part of its attempts to regain commanding of the satellite, Intelsat needs to utilize the antenna at power levels higher than it is currently licensed for. Intelsat will take all practicable steps to ensure safe operation of the earth station and avoid causing harmful interference, including by contacting licensed operators that could be impacted by the proposed operations.

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: Franco Hinojosa

⁵ 47 C.F.R. § 1.3.

⁶ *N.E. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (“*Northeast Cellular*”).

⁷ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.