



September 21, 2022

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

Re: Request for Special Temporary Authority
Haleiwa, Hawaii Earth Station KA265

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing October 20, 2022, to use its Haleiwa, Hawaii C-band earth station, Call Sign KA265,² to provide telemetry, tracking, and command ("TT&C") services during in-orbit testing ("IOT") of Galaxy 33 (S3015) at 133.0 °W.L.³ Galaxy 33 is expected to launch on October 5, 2022, with IOT occurring once the satellite is on-station at 133.0 °W.L. TT&C services to Galaxy 33 will begin on October 20, 2022, and are expected to last approximately 15 days.⁴

IOT of Galaxy 33 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-

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 and a coordination report are attached as Exhibits A and B, respectively.

³ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01326, File No. SAT-LOA-20170524-00078 (June 29, 2018) (Public Notice).

⁴ Intelsat is seeking 30 days of STA to accommodate potential launch delays.

4.2 GHz.⁵ Galaxy 33 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 satellite is operating consistent with its authorization and is capable of using its 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

⁵ 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 Request for STA to provide LEOP to Galaxy 33

Earth Station Call Sign	KA265
Antenna Size (m)	9
Transmit Frequencies (MHz)	6415.0 - 6424.0
Receive Frequencies (MHz)	4000.0 - 4200.0
Emission Designator	1M00F2D
Polarization	Circular
Bandwidth	1 MHz
Transmit Gain	53.5 dBi @ 6.175 GHz
Maximum EIRP per Carrier (dBW)	82.6
Maximum EIRP Density per Carrier (dBW/4 kHz)	58.6
Site Location	Haleiwa, Hawaii
Latitude/Longitude (NAD83)	21° 40' 15.4" N, 158° 2' 3.5" W
Satellite Point(s) of Communication	Galaxy 33 (S3015) 133.0 °W.L.
Satellite Type	Geostationary