



September 27, 2022

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

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

Dear Ms. Dortch:

Intelsat License LLC ("Intelsat") herein requests 30 days of Special Temporary Authority ("STA"),¹ commencing November 5, 2022, to use its Nuevo, California C-band earth station, Call Sign E040125, to provide launch and early orbit phase ("LEOP"), in-orbit testing ("IOT"), and telemetry, tracking, and command ("TT&C") services to the Galaxy 31 (S3076)² and Galaxy 32 (S3078)³ satellites.⁴ Galaxy 31 and Galaxy 32 are expected to launch together on November 5, 2022. Intelsat expects the LEOP, IOT, and drift periods of each satellite to be approximately 90 to 105 days.⁵

The LEOP operations will be performed at the following frequencies: 6422.5 MHz and 6424.5 MHz in the uplink; and 4197.8 MHz and 4199.0 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.

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 Policy Branch Information; Actions Taken*, Report No. SAT-01562, File No. SAT-RPL-20201109-00130 (June 25, 2021) (Public Notice). The in-orbit testing will occur at 148.95° W.L.

³ See *Satellite Policy Branch Information; Actions Taken*, Report No. SAT-01615, File No. SAT-LOA-20210107-00004 (Mar. 4, 2022) (Public Notice).

⁴ The in-orbit testing for Galaxy 31 and Galaxy 32 will be 148.95° W.L. and 149.05° W.L., respectively. In support of this request additional operational information, a waiver request, and a coordination report are attached as Exhibits A-C, respectively.

⁵ For Galaxy 31 the LEOP, IOT, and drift periods are expected to take 10 days, 50 days, and 30 days, respectively. For Galaxy 32 the LEOP, IOT, and drift periods are expected to take 10 days, 65 days, and 30 days, respectively.

The LEOP and drift operations will be coordinated with all operators of satellites that use the same frequency bands and are in the LEOP and drift path and are potentially impacted by IOT.⁶ 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.

In furtherance of the Federal Communications Commission's goal of clearing 3.7-4.0 GHz, grant of this STA request will allow Intelsat to help launch, test, and place Galaxy 31 and Galaxy 32 into service, which will provide continuity of service at the 121.0° W.L. and 91.0° W.L. orbital locations, respectively. Grant of this request will thereby promote the public interest.

Please direct any questions the undersigned at (703) 559-6949.

Respectfully submitted,

/s/ Cynthia J. Grady

Cynthia J. Grady
Assistant General Counsel
Intelsat US LLC

cc: Franco Hinojosa

⁶ Intelsat will handle the coordination.

EXHIBIT A

Intelsat Request for STA for Galaxy 31 and Galaxy 32

Earth Station	E040125
Antenna Size (m)	11.1
Transmit Frequencies (MHz)	6422.5 and 6424.5
Receive Frequencies (MHz)	4197.8 and 4199.0
Emission Designator	1M00F2D
Polarization	Linear and Circular
Bandwidth	1 MHz
Transmit Gain	54.8 dBi @ 6.423 GHz
Maximum EIRP per Carrier (dBW)	85
Maximum EIRP Density per Carrier (dBW/4 kHz)	61.92
Site Location	Nuevo, CA
Latitude/Longitude (NAD83)	33° 47' 43.4" N, 117° 5' 21.1" W
Satellite Point(s) of Communication	Galaxy 31 (S3076)
	Galaxy 32 (S3078)
Satellite Type	Geostationary
Satellite Location ⁷	Galaxy 31 IOT 148.95° W.L.
	Galaxy 32 IOT 149.05° W.L.

⁷ This STA request includes operation during the LEOP and drift of both satellites.